



Society of Actuaries in Ireland

Current Topics Paper 2024

2 December 2024

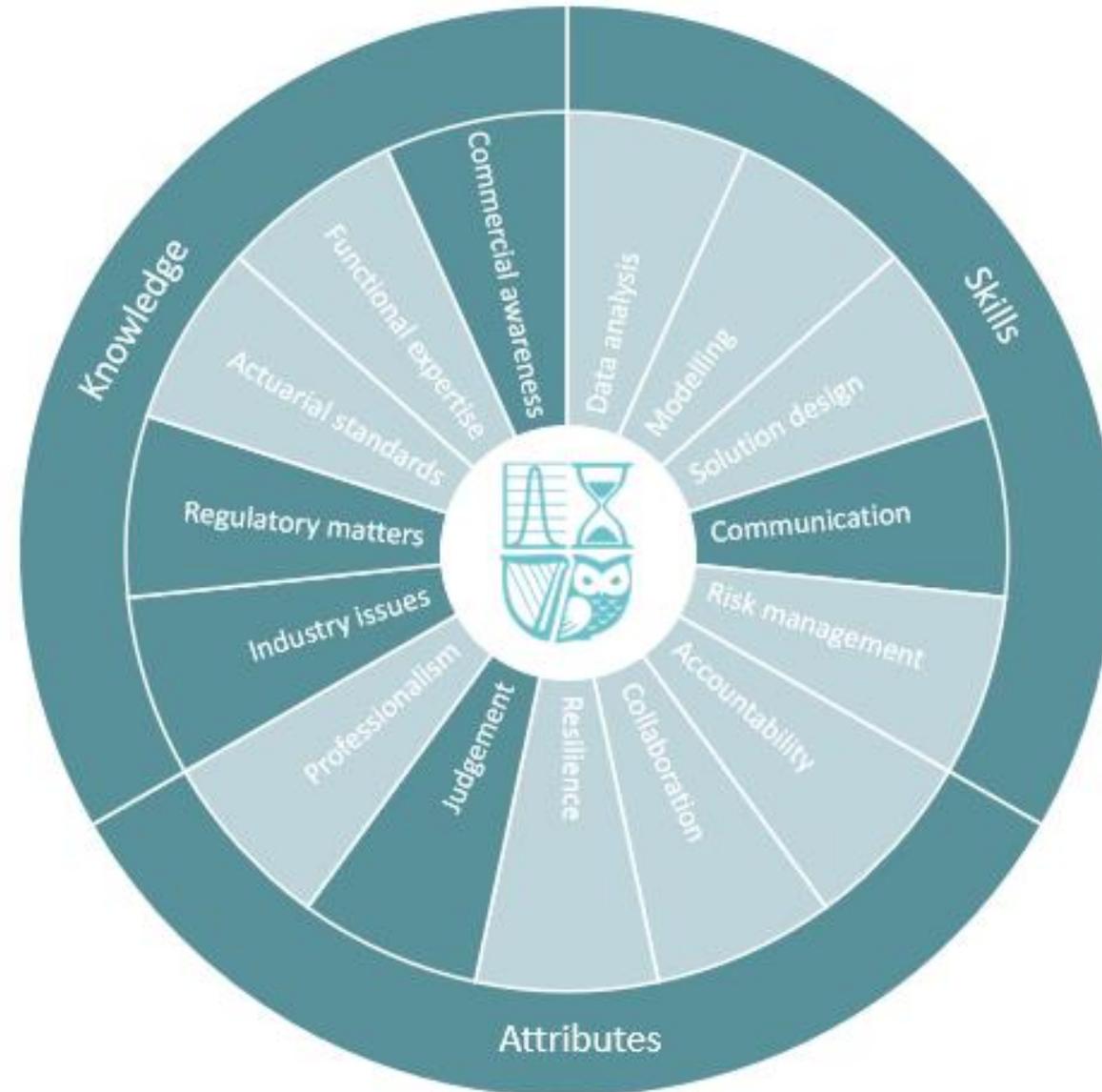


Disclaimer

The views expressed in this presentation are those of the presenter(s) and not necessarily those of their employer(s) (if any) or the Society of Actuaries in Ireland.



Competency Framework Wheel





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- **Healthcare:**
- **General Insurance:**
- **AI:** Joseph Sloan
- **Cross-Practice Regulatory Updates:** Sinéad Clarke, Sandra Heaslip



Agenda

- Life and Health
- Pensions and Investments
- General Insurance
- AI in Actuarial Work
- Cross-Practice Regulatory Updates



Society of Actuaries in Ireland

Life and Healthcare

Tomás Hayes



Topics Covered

- Life Insurance 2023 Market Update
- IFRS 17 Implementation
- COVID Review – Excess Mortality and Assumption Setting Impacts
- Right to Be Forgotten
- Solvency II Review
- Impact from Return of Positive Interest Rates
- Fertility Rates

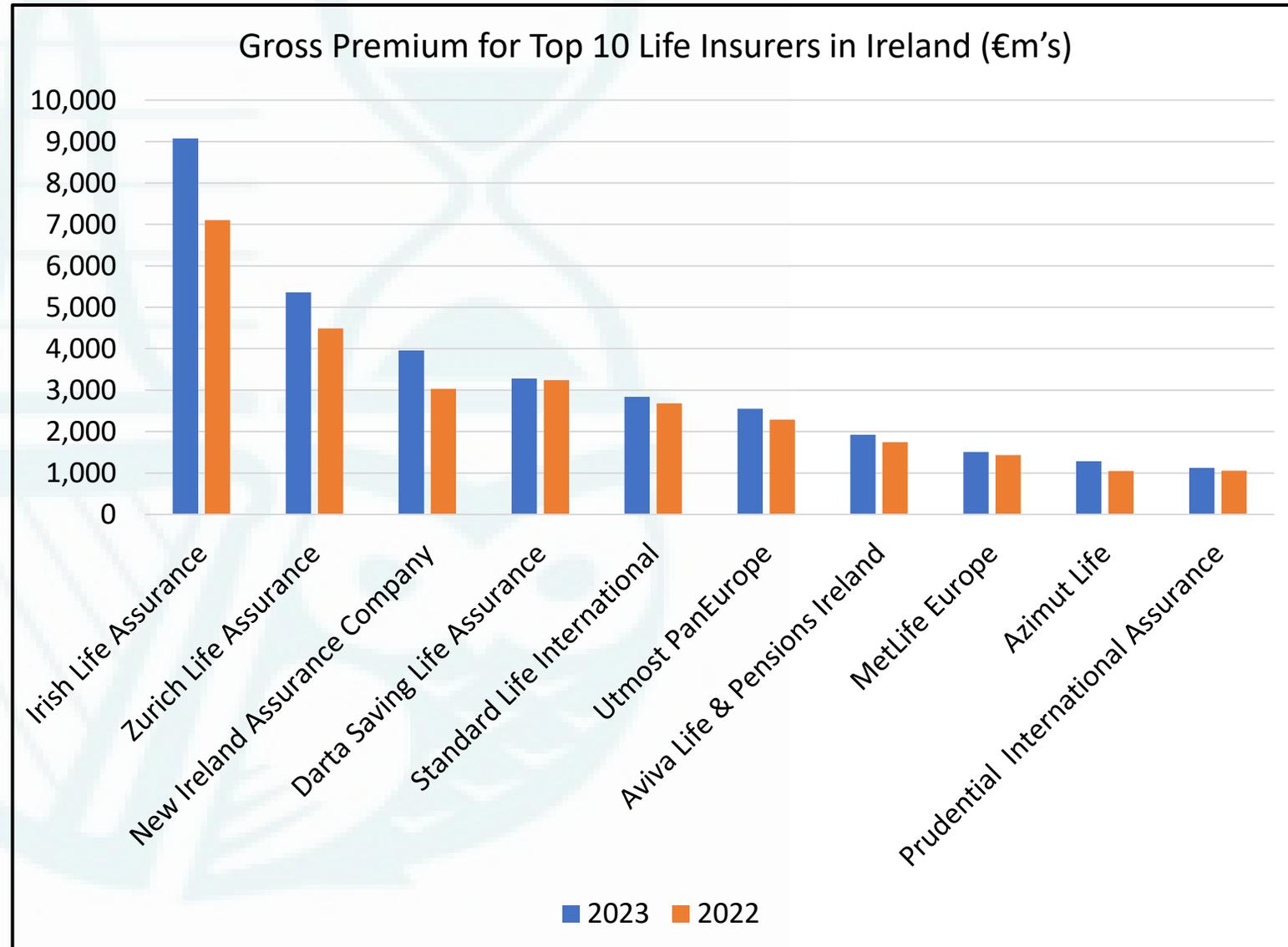


2023 Recap - Premiums

€41.6 bn

The total premiums written by life insurance companies in Ireland was €41.6 bn.

This is approximately split by €22.2 bn for premiums written in the domestic market and €19.5 bn in the cross-border market.





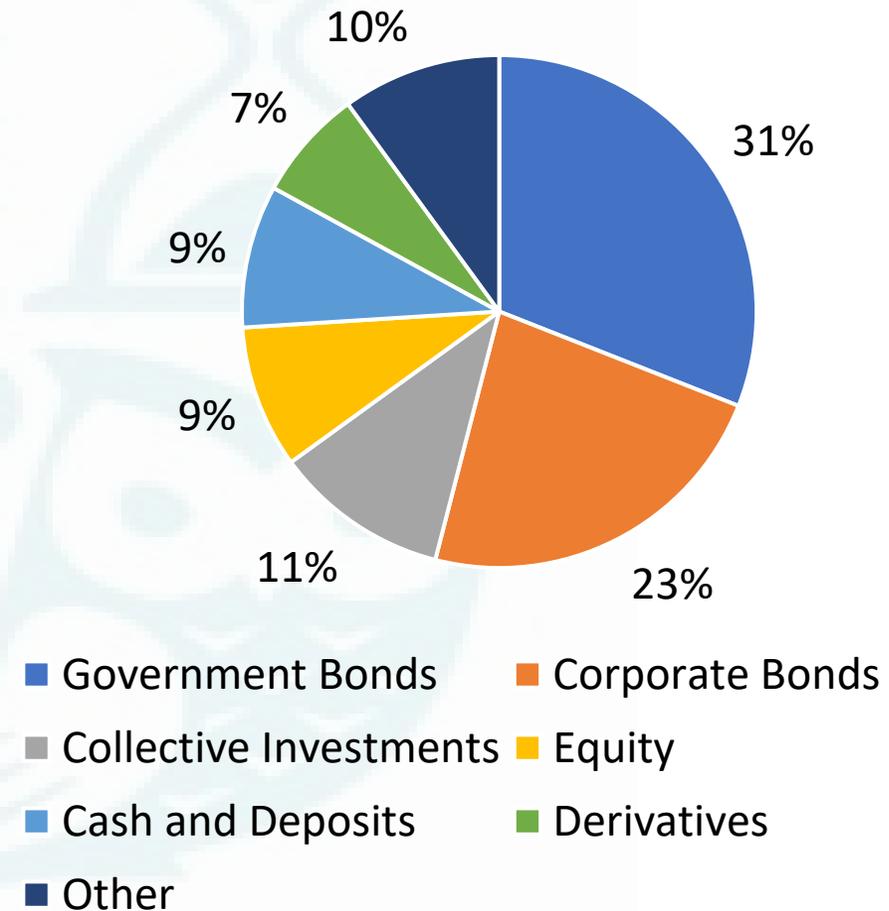
2023 Recap - Investments

€342 bn

The total assets held by life insurance companies at YE 2023 was €342 bn.

Most of the assets relate to unit-linked business (€271 bn).

% of Total Investments Held





2023 Recap – Solvency Coverage Ratio

167%

The solvency coverage ratio decrease from 188% in 2022 to 167% in 2023

9/35

Only 9 out of 35 regulated life insurance companies reported an increase in solvency coverage ratio in 2023

Influencing Factors

- Decrease interest rates
- Positive investment markets
 - New business sales



IFRS 17 – Key Changes

Emergence of Profits

Under IFRS 17, no profits can be recognized at inception. Instead, a contractual service margin (CSM) liability is set up that is equal to the present value of expected future profits plus a risk adjustment. The CSM is then amortized over the lifetime of the contract, and this is recognized as income in the profit and loss.

Measurement Model

There are 3 measurement models used under IFRS 17 for different types of insurance contracts:

- General Measurement Model (GMM),
- Premium Allocation Approach (PAA), and
- Variable Fee Approach (VFA).

Grouping of Contracts

Measurement is based on groups of insurance contracts that have similar risks and are managed together. Contracts are also grouped into annual cohorts under IFRS 17.

Discount Rates

Discount rates under IFRS 17 need to be consistent with current market prices and reflect the characteristics of the cashflows and insurance contract's liquidity.

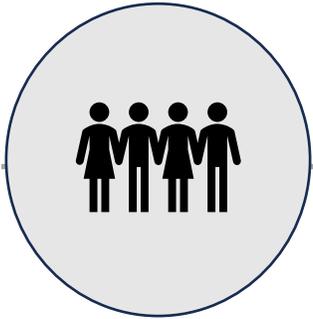
Risk Adjustment

There are no prescribed approaches under IFRS 17 for measuring the risk adjustment. Insurers commonly use confidence level, cost of capital or margin approaches

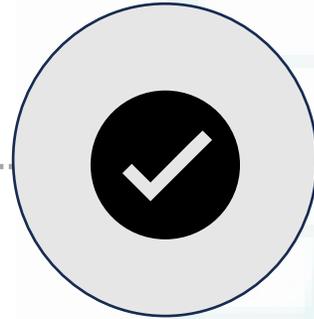


IFRS 17 – Implementation and Next Steps

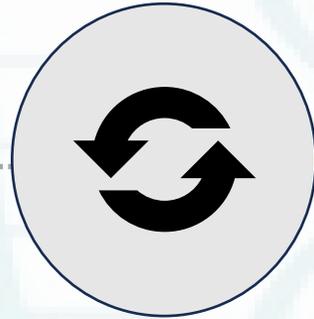
Implementation



Project Teams



Restated
Comparatives



System and
Model Upgrades

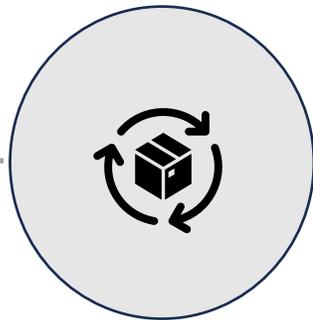


Training and
Change
Management

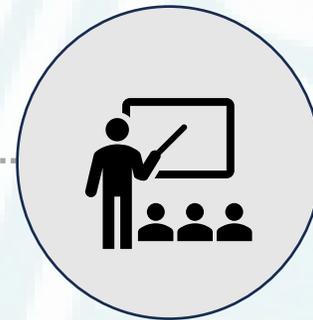


Incorporation
into KPIs

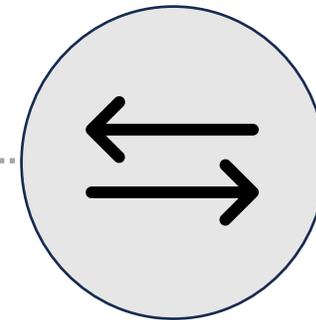
Next Steps



Continuous Improvement



Training and Knowledge
Sharing



Learnings for Future
Regulatory Changes



COVID-19 Impact – Excess Mortality

Background:

SAI report examined excess mortality during 2020-2021. Focuses on observed vs. expected deaths

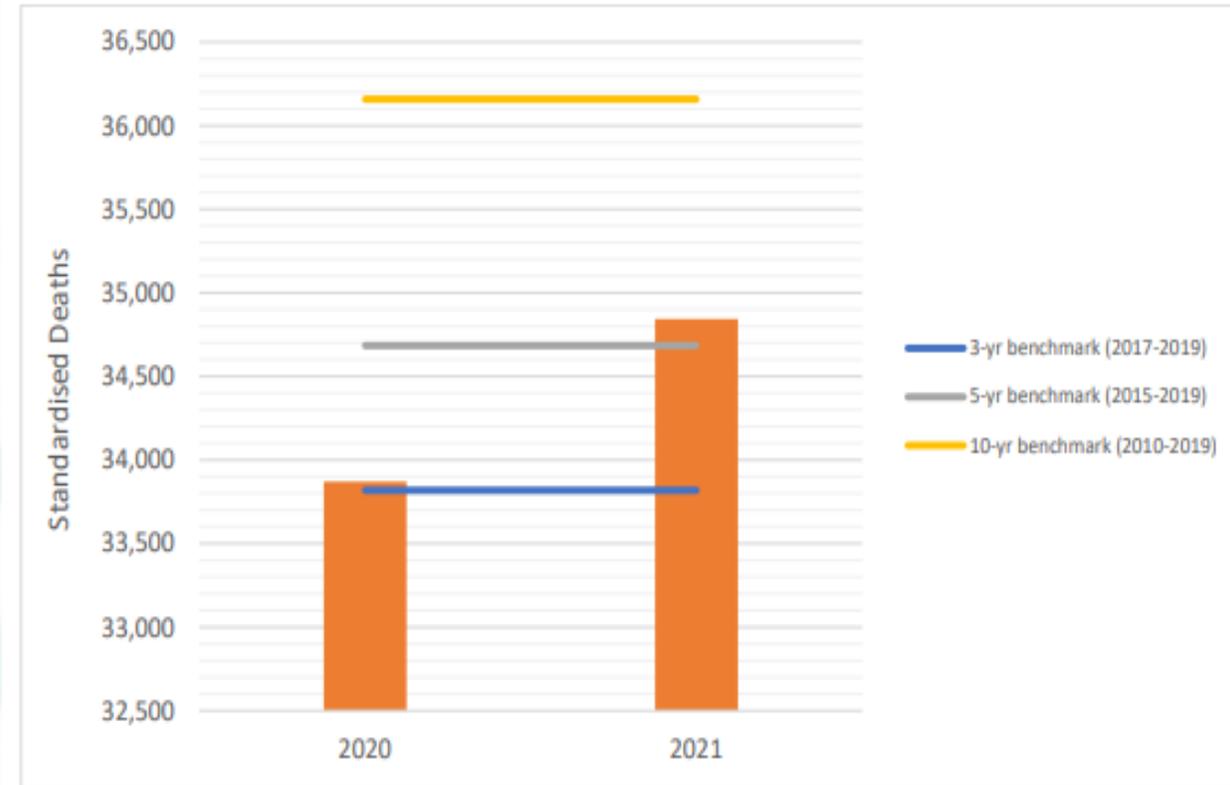
Key Findings:

Mortality Trends:

- Pre-pandemic: Rising life expectancy.
- Pandemic: Disruption and increase in mortality, especially among 85+.

2020 & 2021:

- 2020: Marginal excess mortality due to stringent measures.
- 2021: Significant rise in excess deaths with eased restrictions.
- Total excess deaths: ~1,100 over two years.
- Results vary by benchmark period (3-year, 5-year, 10-year).





COVID-19 Impact – Assumption Setting

Option 1: Ignore or Down-weight COVID-19 Data

This method involves excluding or reducing the weight of data from years heavily impacted by COVID-19 (i.e., 2020 and 2021) in the analysis. This approach is straightforward and rationalises the exclusion based on the belief that these years do not represent normal mortality conditions.

Option 2: Adjust Data Impacted by COVID-19

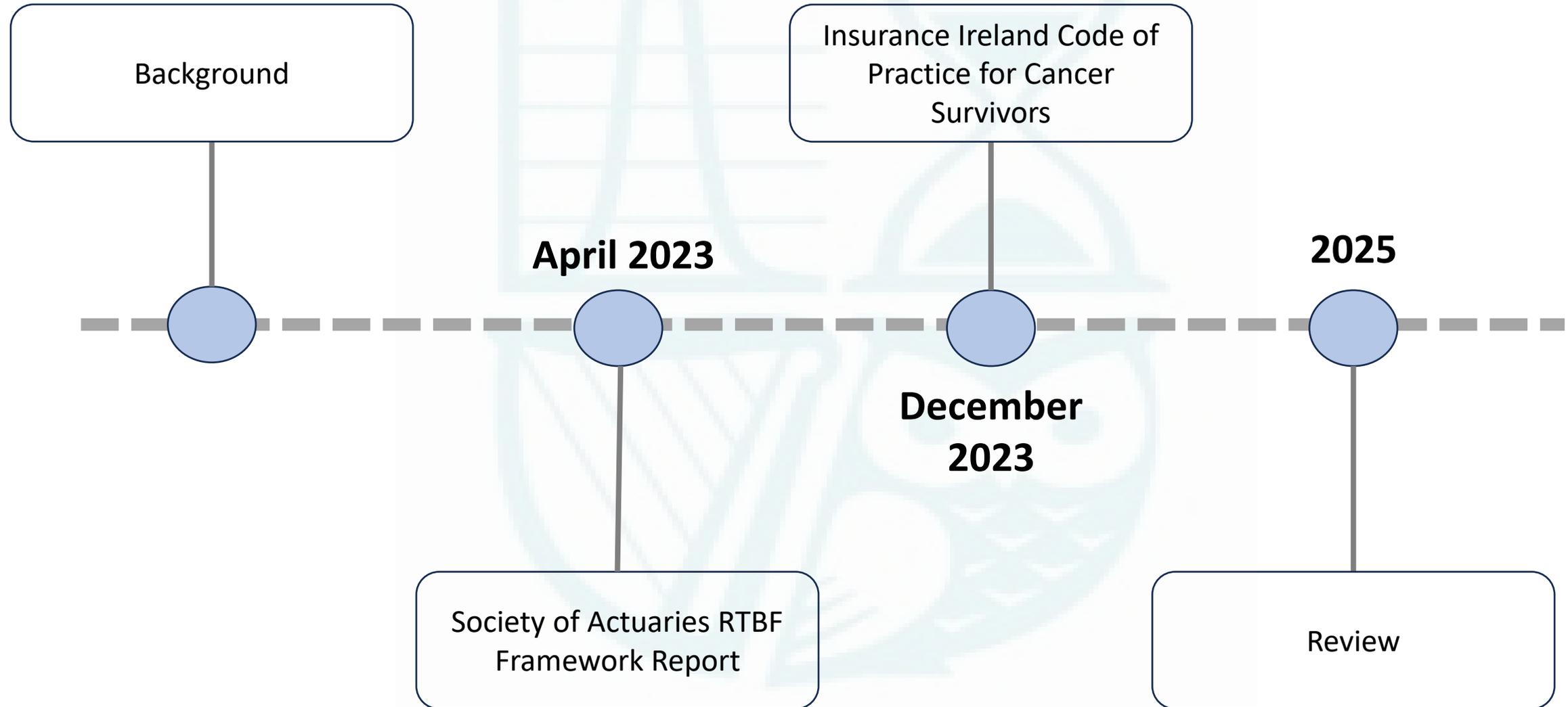
In this method, actuaries estimate the portion of deaths attributable to COVID-19 and adjust the data accordingly. This usually involves using population data as a proxy, with adjustments for factors like age and socioeconomic status.

Option 3: Driver-based Approach to Adjusting Assumptions

This is the most comprehensive method, involving a detailed analysis of the underlying drivers of mortality changes due to COVID-19. The process includes identifying the main drivers, quantifying their impact, and projecting these effects into the future.



Right to be Forgotten (RTBF) – Timeline





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Solvency II Review

Joanne Tan *(she/her)*



Solvency II Review

Timeline

- 2019 – 2020: EIOPA issued consultations, impact assessment and proposals
- 2020 – 2023: Discussion and negotiation between the European Commission, European Council and European Parliament
- 2023 – 2024: European Parliament approved the final version of amendments
- Nov 2024: European Council approved the final texts
 - Amending Solvency II Directive
 - Introducing Insurance Recovery and Resolution Directive (IRRD)
- What's next?
 - Directives to be published in the EU's Official Journal
 - 20 days later: Directives enter into force
 - In 2 years' time: Directives go live!



Solvency II Review

Risk-free interest rate extrapolation

- Extrapolation starts from the First Smoothing Point (FSP) of 20 years
 - Unchanged from current
- Alternative extrapolation method (AM) is introduced
 - Introduction of parameter alpha: speed of convergence of extrapolated forward rates towards the Ultimate Forward Rate (UFR)
 - By year 40 after FSP, the weight of UFR should have increased to at least 77.5%, i.e. alpha is floored at 11%
 - Phasing in subject to regulatory approval and disclosed in SFCR
 - Details to follow in Level 2 texts



Solvency II Review

Risk margin

- Cost of capital = 4.75%
 - Could potentially be amended in Level 2 texts after 5 years, but within a corridor of 4% – 5%
- Introduction of lambda factor:
 - To account for time-dependency of risks
 - Reduces the amount of the capital requirement used in calculating risk margin over time
 - Details to follow in Level 2 texts



Solvency II Review

Volatility
adjustment

Interest rate
SCR

Symmetric
adjustment

Proportionality

Liquidity Risk
Management
Plan

SFCR and
reporting
timeline

...and more



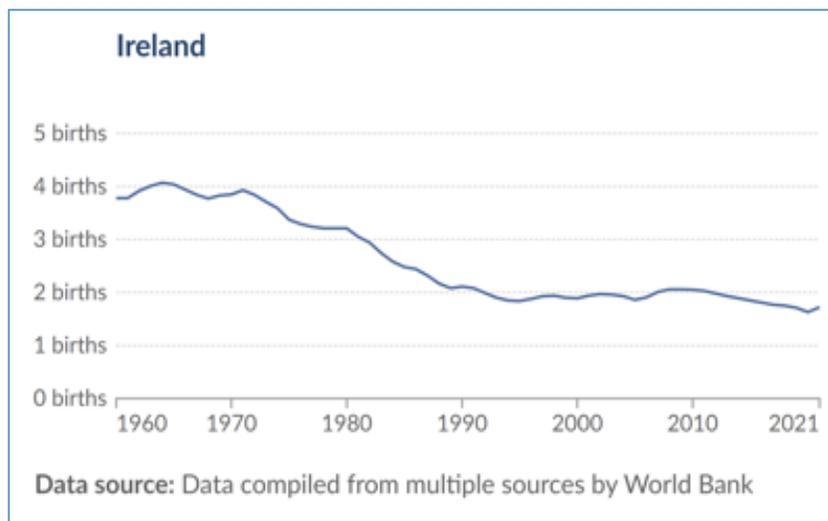
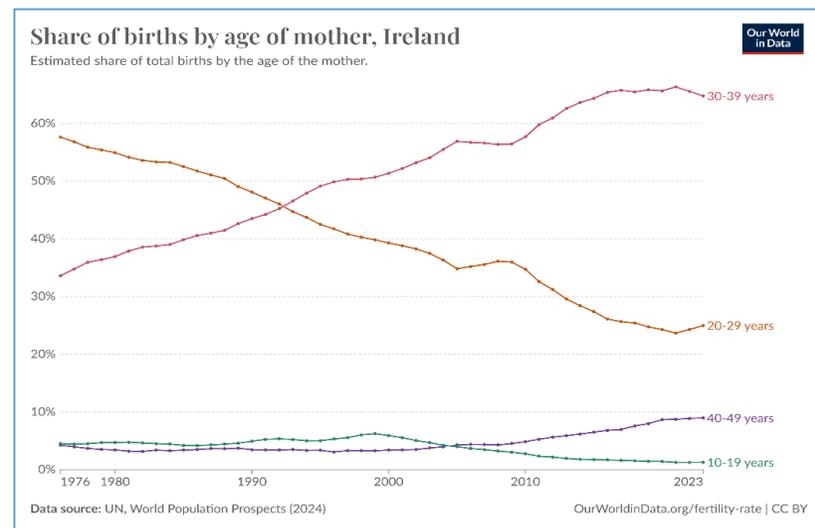
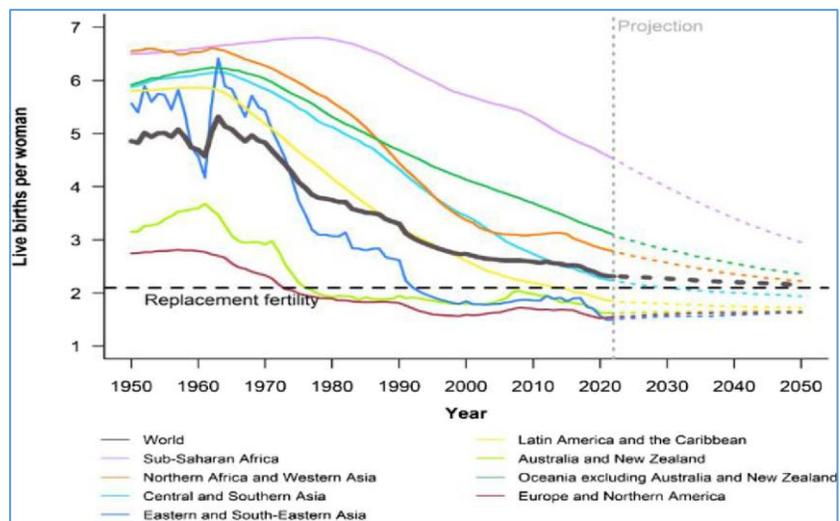
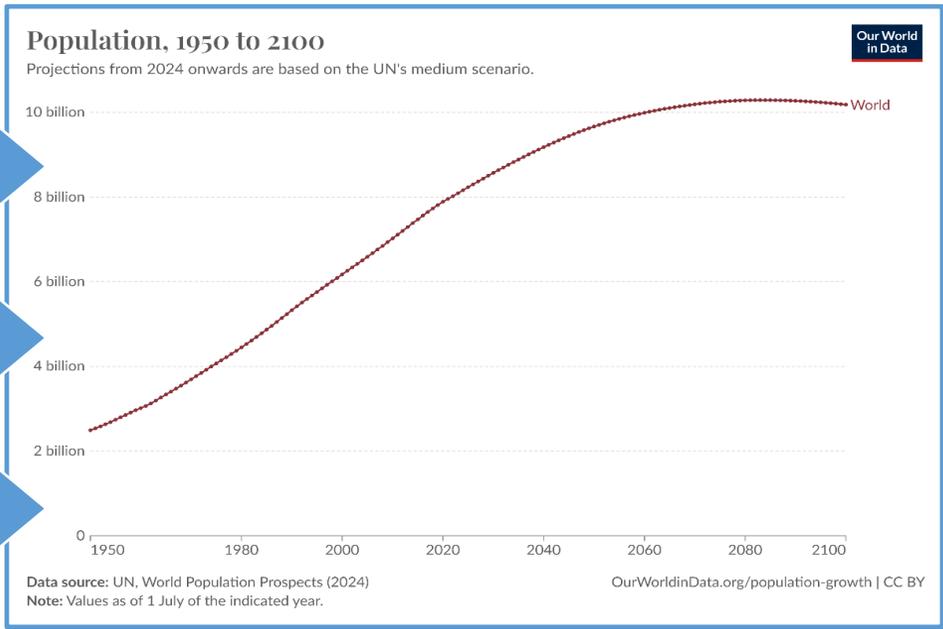
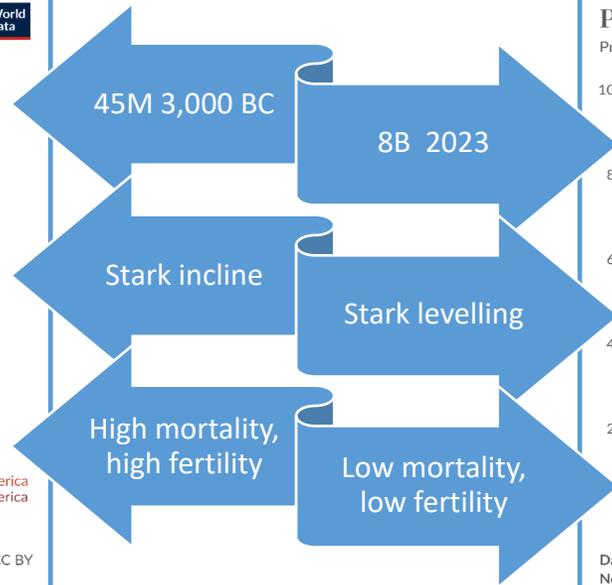
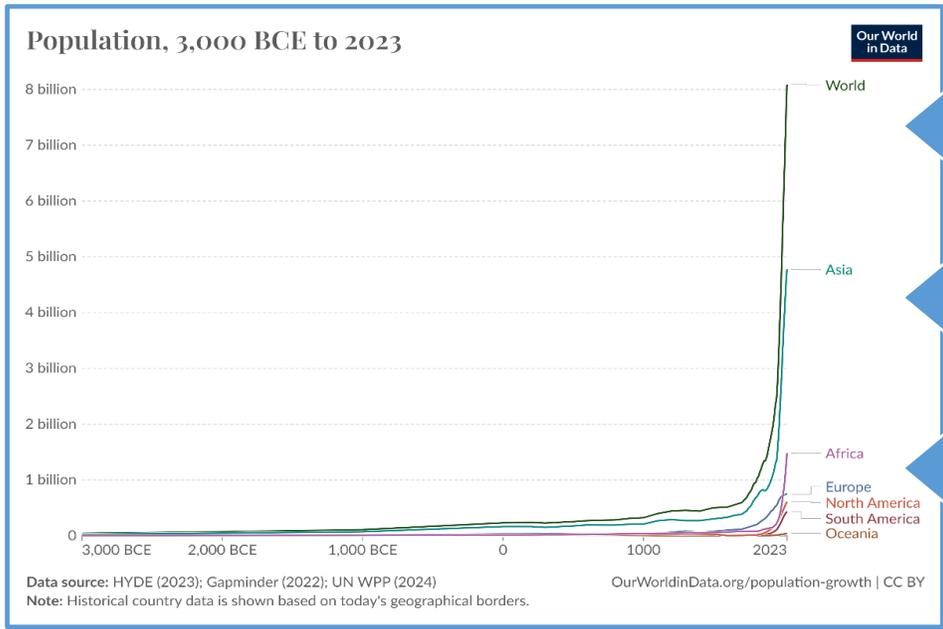
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Fertility Trends

Daniel McAleese

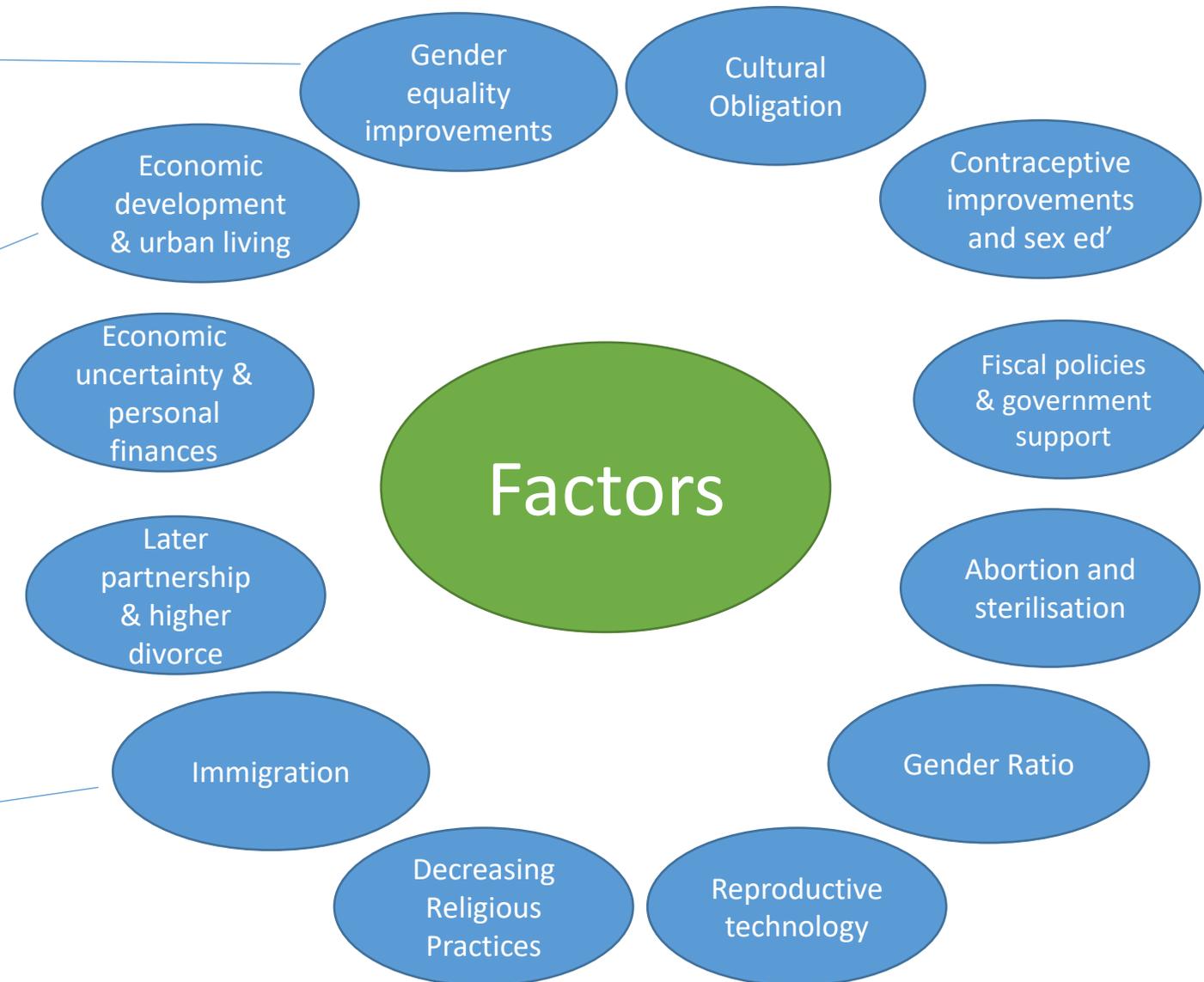
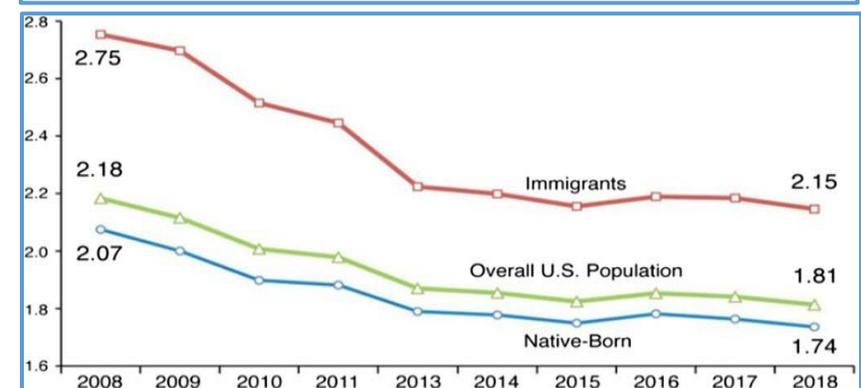
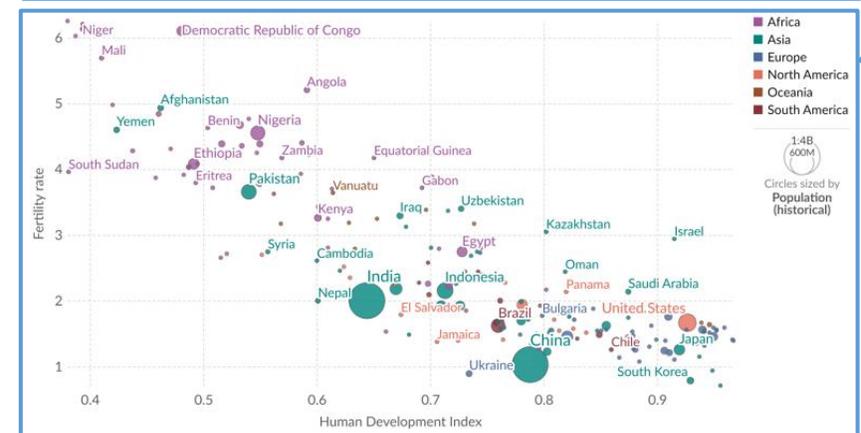
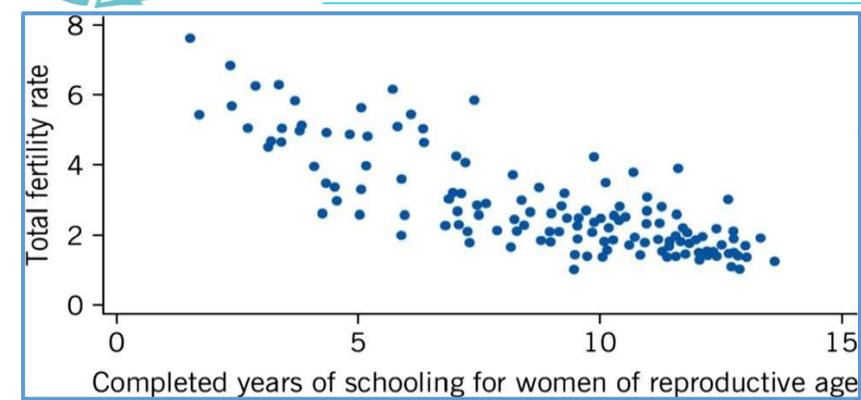


Fertility Introduction



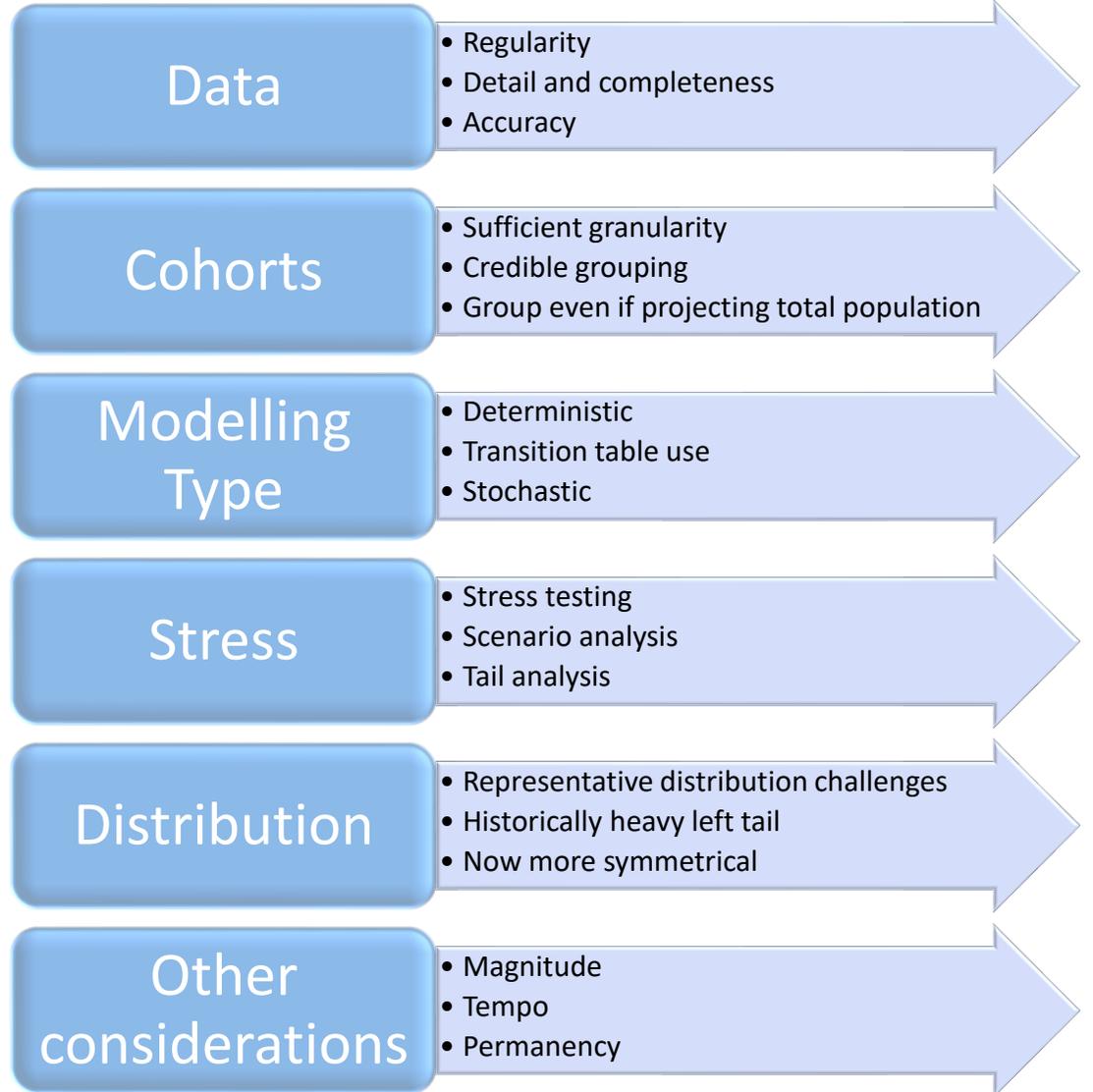
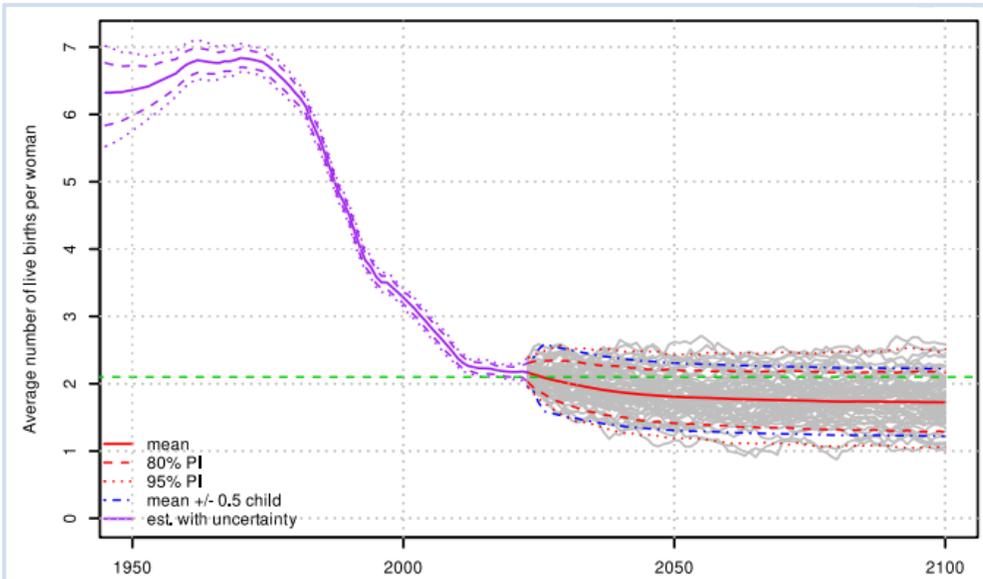
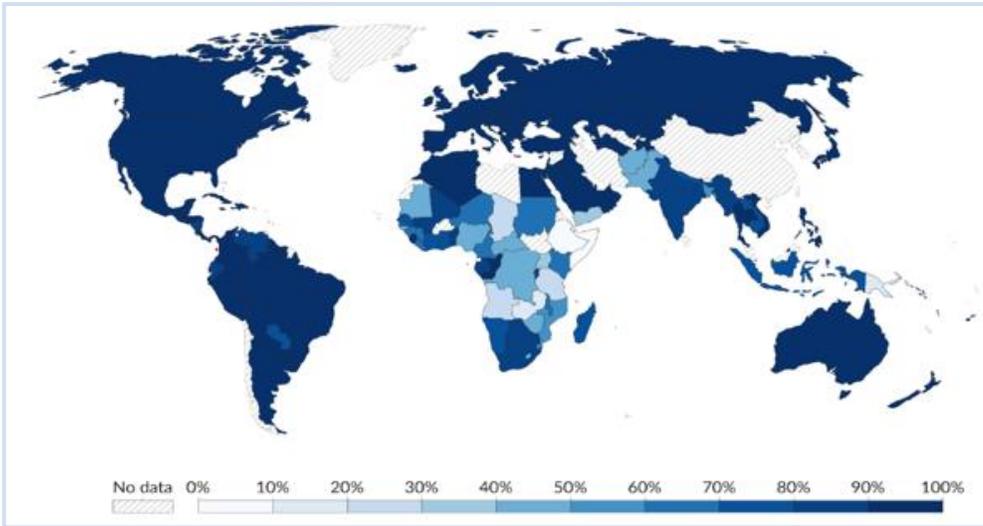


Factors Influencing Fertility Change





Modelling Considerations





Future Considerations

Market sizes

Climate stress

Dependency ratio

GDP, economic growth and innovation

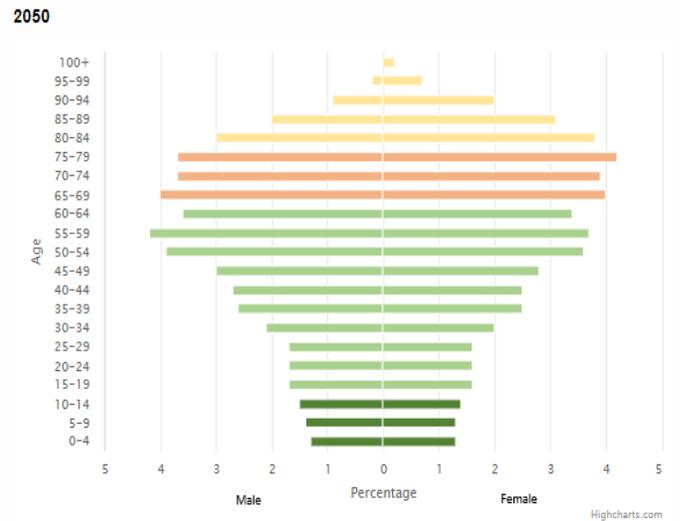
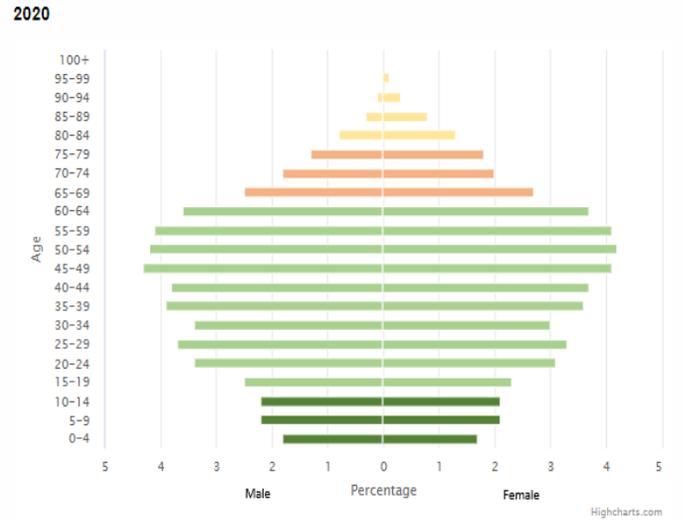
Housing

Education and healthcare

Labour shortages

Demographic dividends, immigration changes

Government incentives



Countries with fertility rates above or below replacement level, 2023

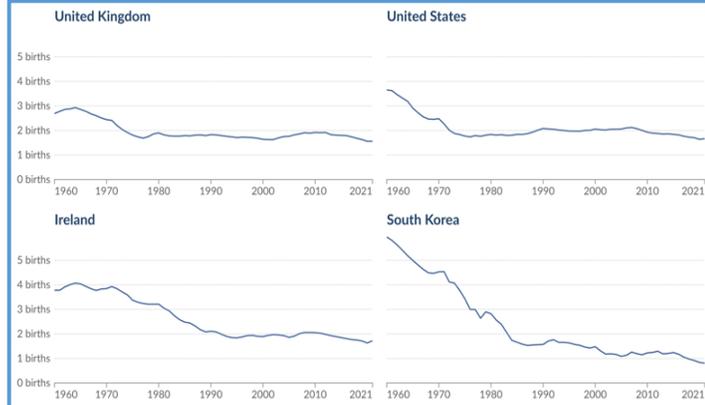
Fertility rates measure the average number of live births per woman. The "replacement level" is the rate at which population size remains constant from generation to generation; this is crudely defined as 2.1 births per woman.



Data source: UN, World Population Prospects (2024)

OurWorldinData.org/fertility-rate | CC BY

Note: The total fertility rate is the number of children born to a woman if she lived to the end of her childbearing years and gave birth to children at the current age-specific fertility rates.





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Healthcare

Christine Kelly



Healthcare – Topics Covered

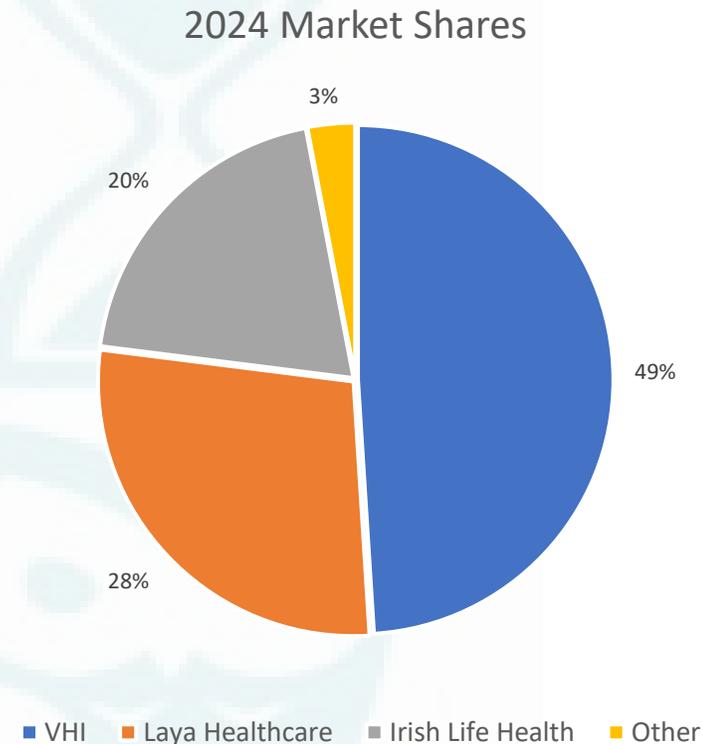
- Health Insurance Market Update, premiums & claims trends
- Sláintecare Update
- Advancements in Healthcare



Healthcare – Private Health Insurance Market

- Total Premium income of €3.2 billion over 2023
- Total claims paid by health insurers - €2.85 billion over 2023
- New Health Insurer – Level Health

Level Health





Rising Premiums and Claims costs

Rising Claims costs

Factors for increase in claims costs:

- Volume
 - Trend? Increased day case procedures
- Size of Claims
 - High-cost Drugs

Rising Premiums

Average Adult, 10% - 11% premium increase over 2023

Ageing population will also affect future premiums.

Old Age Dependency Ratio – from 25% to 50% by 2050



Sláintecare Update

Public Only Consultant Contract (POCC)

- Launched in March 2023
- Removal of Private Care from Public Hospitals
- Public hospitals claims will reduce, private may increase.
- Less need for non-advanced plans?

Waiting List Action Plan (WLAP)

- 2022 – first annual reduction in waiting lists since 2015
- 2024 aim – 5.9% reduction in waiting lists
- HIA 2023 consumer survey – 11% have PMI due to waiting lists for public services, 13% due to inadequate standard of public services



Technology/Advancements in HealthCare

- Advancements – improving quality of life.
 - Age related Macular Degeneration (AMD)
 - Degenerative condition causing sight loss
 - Treatment: injection of drugs into the eyeball
- Gene Therapy – introduction of normal genes into cells in place of missing/defective ones.
 - Metachromatic leukodystrophy (MLD) – leads to damage of white matter in the nervous system
 - Degenerative condition, death within 5-6 years in early onset form.
 - Gene is inserted so that the patient can create the non-faulty gene
- Drug Development globally is increasing exponentially





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Pensions and Investments

Aaron Kilboy and Ciara Murphy



Introduction

Defined Contribution Market Update

- Market Statistics
- Pension Coverage
 - Master Trusts
- DC Investment Market Trends

Individual Pensions Update

- Standard Fund Threshold Review
 - Changes to PRSAs
 - Changes to the State Pension
- Progress on Pension Simplification Measures
 - The Gender Pensions Gap
 - In-Scheme Drawdown



Introduction

Defined Benefit Update

- Market Statistics
- Improved funding levels
- Investment de-risking activity
- Cashflow management strategies
- LDI and collateral management
- Bulk annuities and deferred annuity products



Master Trusts

Significant growth of Master Trusts in Ireland over the past two years – as of August 2024 there were 17 Master Trusts operating in Ireland with €29.2 billion in assets.

Benefits

Consolidation

Economies of scale

Compliance

Member outcomes

Governance

Drawbacks

Loss of control

A lack of customisation

Limited fund choices

A conservative default strategy

Cross subsidies arising



Master Trusts – what's next?

Growth and Consolidation

Master Trusts are expected to continue to increase in size.

Anticipated consolidation to fewer, larger Master Trusts (c. 5-6 Master Trusts).

Employer Movement

Movement by employers between Master Trusts is likely to increase.

Oversight and Governance

Growing trend of employers establishing Oversight Committees to ensure proper operation and reassurance for employers and members.

This area is supported by the Pensions Council's guidance emphasising local oversight and engagement.



Standard Fund Threshold

The Standard Fund Threshold (SFT) is the limit, or ceiling, on the total capital value of tax-relieved pension benefits that an individual can draw down, in their lifetime, from all of their pension arrangements.

The SFT was introduced in December 2005 and is currently set at €2 million.

If your pension fund exceeds this threshold, the excess amount is subject to a Chargeable Excess Tax currently set at 40% which is normally deducted from the pension fund.

Total Pension
Fund Value:
€2.5 million

Excess Amount:
€500,000

Chargeable
Excess Tax:
€200,000

Net Excess After
CET: €300,000



Standard Fund Threshold Review

A review of the SFT was announced on 14 December 2023.



A consultation period ran from 14 December 2023 to 11 February 2024.



Over the course of summer 2024, the Minister for Finance considered the consultation results, and updates were announced in September 2024.



Standard Fund Threshold Review - Updates

The SFT will increase on a phased basis from €2.0 million to €2.8 million over the years 2026 to 2029.

From 2030 onwards, the intention is to increase the limit each year in line with an applicable level of wage growth.

Year	SFT Limit
2024	€2.0 million
2025	€2.0 million
2026	€2.2 million
2027	€2.4 million
2028	€2.6 million
2029	€2.8 million
2030+	The limit each year will increase in line with an applicable level of wage growth.



Standard Fund Threshold Review – Benefits?

Who will these changes benefit?

- Individuals who have previously fully utilised their SFT will not be able to avail of the increases in the thresholds.
- For individuals who have partially utilised their SFT then a portion of the increases will be available.
- These changes will create additional pension funding capacity over the medium term for high earning employees who are likely impacted by the current SFT limit.
- Those planning for retirement in the coming years may financially benefit from timing their retirement date to align with an increase in the SFT.



Changes to PRSAs

A Personal Retirement Savings Account (PRSA) is a long-term savings account to help people save for their retirement.

Before Finance Act 2022

- Employer contributions treated as taxable Benefit-in-Kind.

After Finance Act 2022 (from 1 Jan 2023)

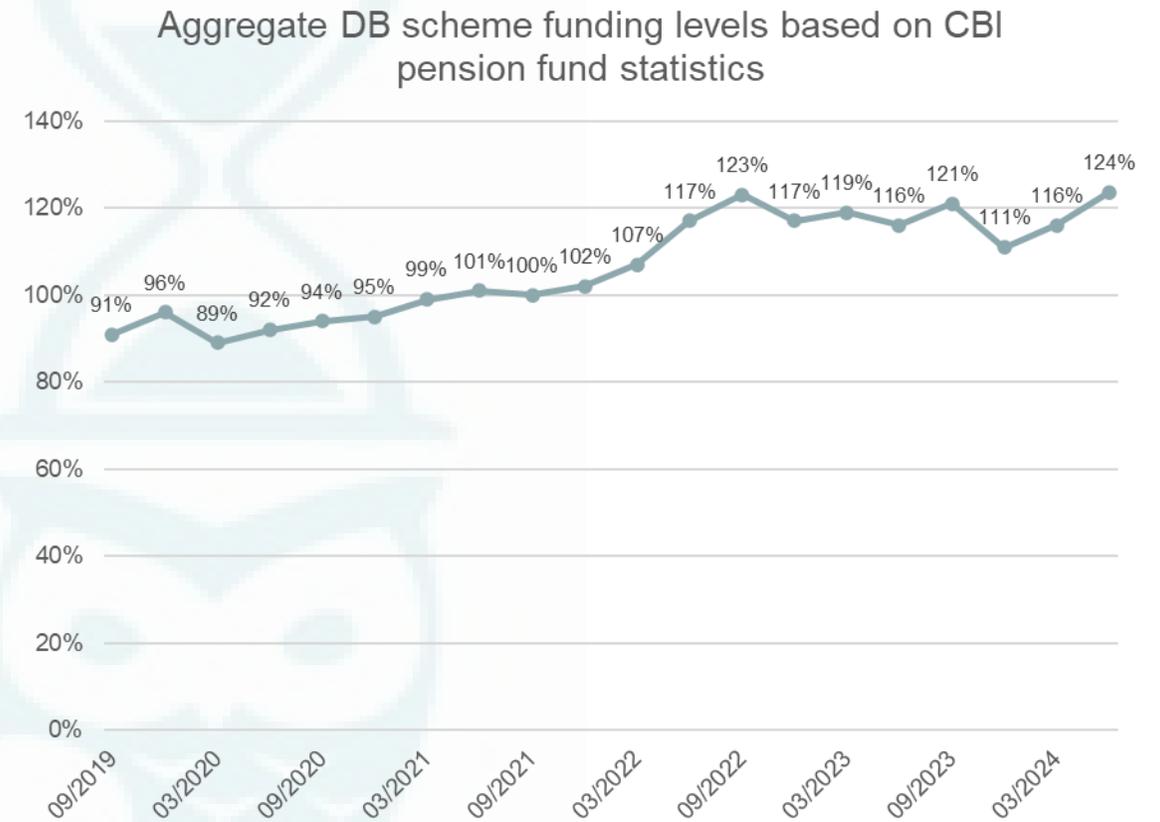
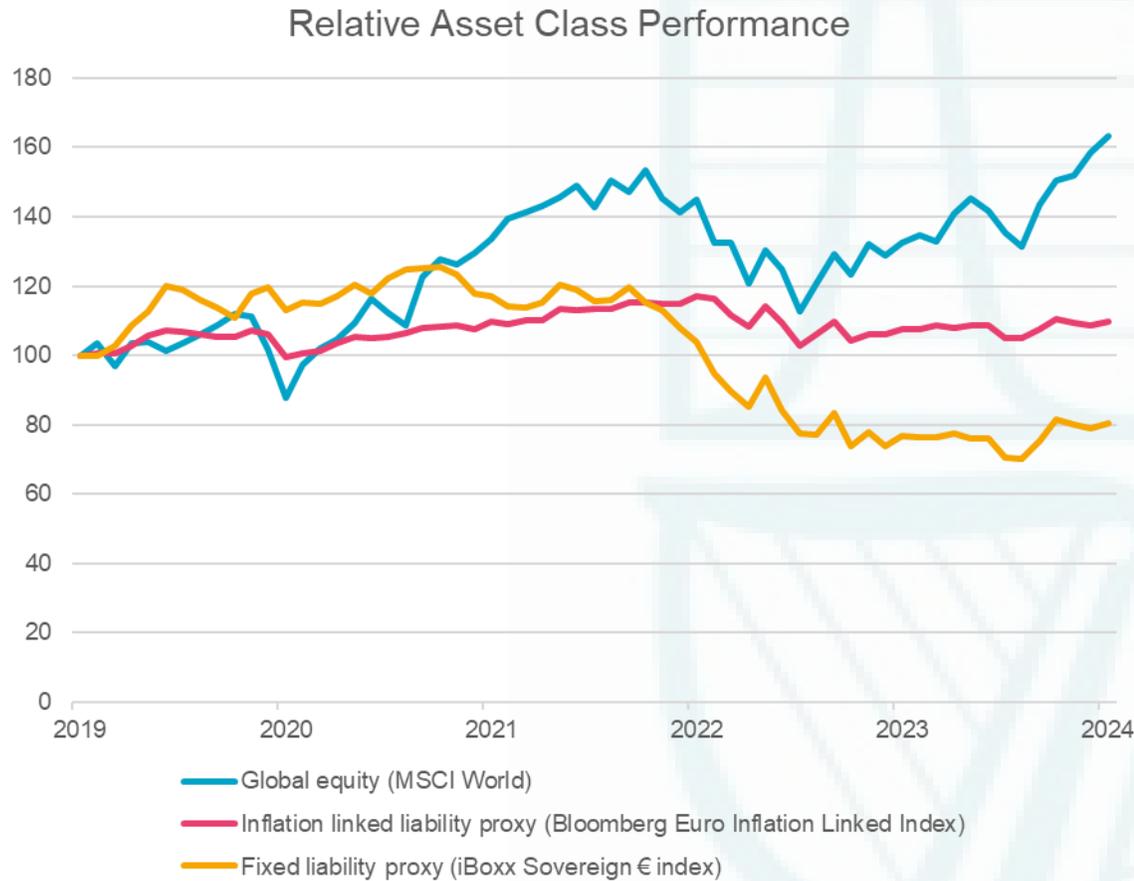
- No longer a Benefit-in-Kind.
- Not counted towards employee's age-related contribution limit.
- No limit on employer contributions, subject to €2m SFT.

After Finance Act 2024 (from 1 Jan 2025)

- Cap on employer contributions at 100% of employee/director income.
- Excess contributions treated as Benefit-in-Kind.



DB schemes - improved funding levels



Rising interest rates in 2022, coupled with strong equity markets have seen Irish DB schemes with materially improved funding positions.



DB investment de-risking

“De-risking” means:

- **Less growth assets**
 - Reduced holdings in volatile assets like equity, property, infrastructure and private assets
- **More liability matching assets**
 - Government bonds, IG corporate bonds, swaps/LDI, cash, bulk annuity (discussed later)
- **Higher levels of interest rate and inflation hedging**
- **Greater resilience to market shocks**

Funding Standard Reserve as % of Total MFS Liability

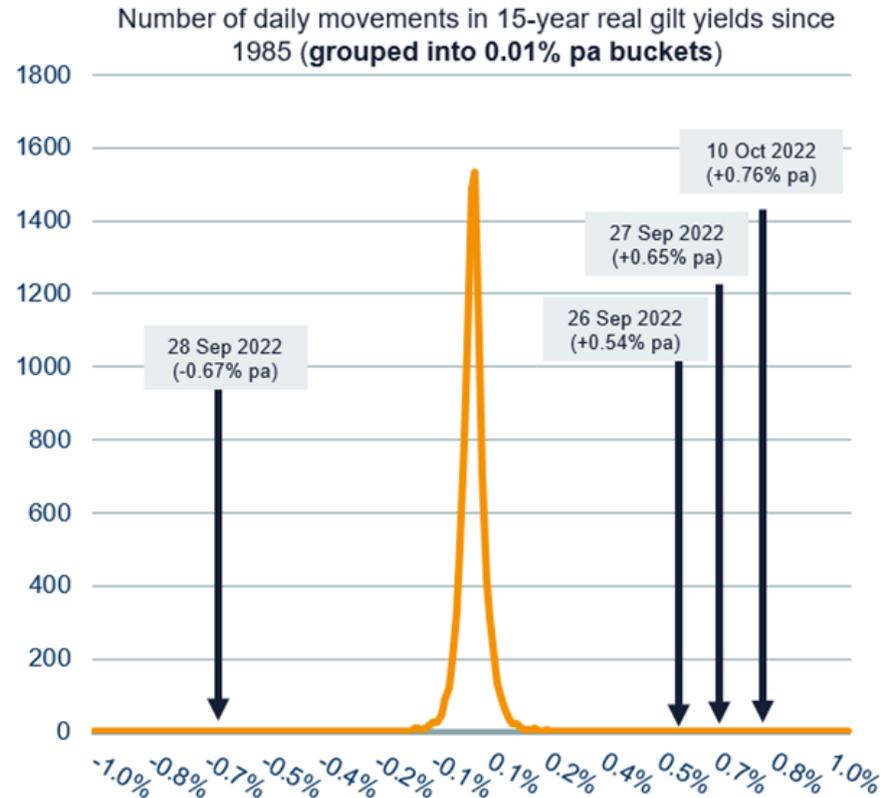


As funding levels have improved, many Irish DB schemes have taken the opportunity to reduce investment risk.



Thinking about liquidity risk and LDI for DB schemes

A crisis in the UK....



.. has meant learnings for us all about managing risks with LDI collateral

An tOidáris Pínean
The Pensions Authority

Investment strategy (liquidity risk) guidance for trustees

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Date published: June 2024

CONSULTATION PAPER

CONSULTATION PAPER

on the draft Opinion on the supervision of liquidity risk management of IORPs

EIOPA-BoS-24-318
26 September 2024

eiopa
European Insurance and Occupational Pensions Authority

The UK gilts crisis of Sept/Oct 2022 has brought liquidity risk management for LDI investment strategies to the front of trustees and regulators' minds.



Thinking about bulk annuities

Deferred annuities are on the way, but require some careful consideration from insurers and trustees...

Transfer Values

Benefit revaluation

*Death before retirement benefits:
spouse's, dependants, lump sum*

Trustee discretion

Commutation factors

Early / late retirement

Pension Adjustment Orders

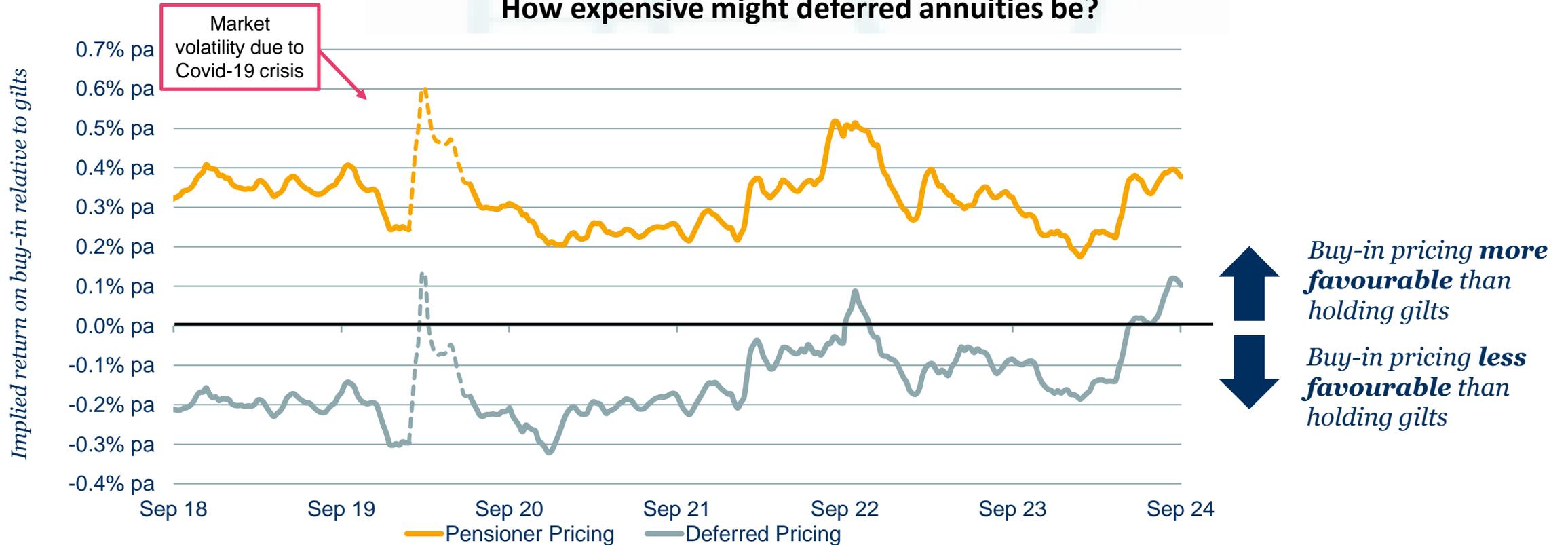
Ill-health retirement

The emergence of deferred bulk annuities and full-scheme solutions in future will allow Schemes to significantly reduce risks. It may also see an acceleration in the pace of Scheme wind-ups in the medium term.



Thinking about bulk annuities

How expensive might deferred annuities be?



UK experience suggests that deferred annuity pricing will be below pensioner pricing, and in line with or marginally below government bond yields.

Source: LCP UK insurer pricing model, which is calibrated against actual UK transaction pricing. The gilts benchmark is illustrative only and intended to capture movements in insurer pricing over time relative to gilts (and is adjusted to remove the impact of changing views on longevity). In practice, insurer pricing depends on a wide range of factors such as transaction size, benefit structure, membership profile and insurer appetite and can differ materially from that shown above for any given scheme.



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General Insurance

Ryan Haughey



General Insurance Agenda

- Legal Environment
 - Injuries Resolution Board
 - Legal Challenge for the PIGs
 - Catastrophic Injuries
 - Occupier's Liability Act
- Private Motor Insurance
- Employer's & Public Liability Insurance
- Flood Risk
- Evolving Transport
 - Electric Vehicles
 - E-Scooters



Injuries Resolution Board (IRB)

- Ireland's independent State body which resolves personal injury claims
- Originally Personal Injuries Assessment Board (PIAB)
- Personal Injuries Guidelines (PIG) introduced in April 2021

Claims Reported to IRB

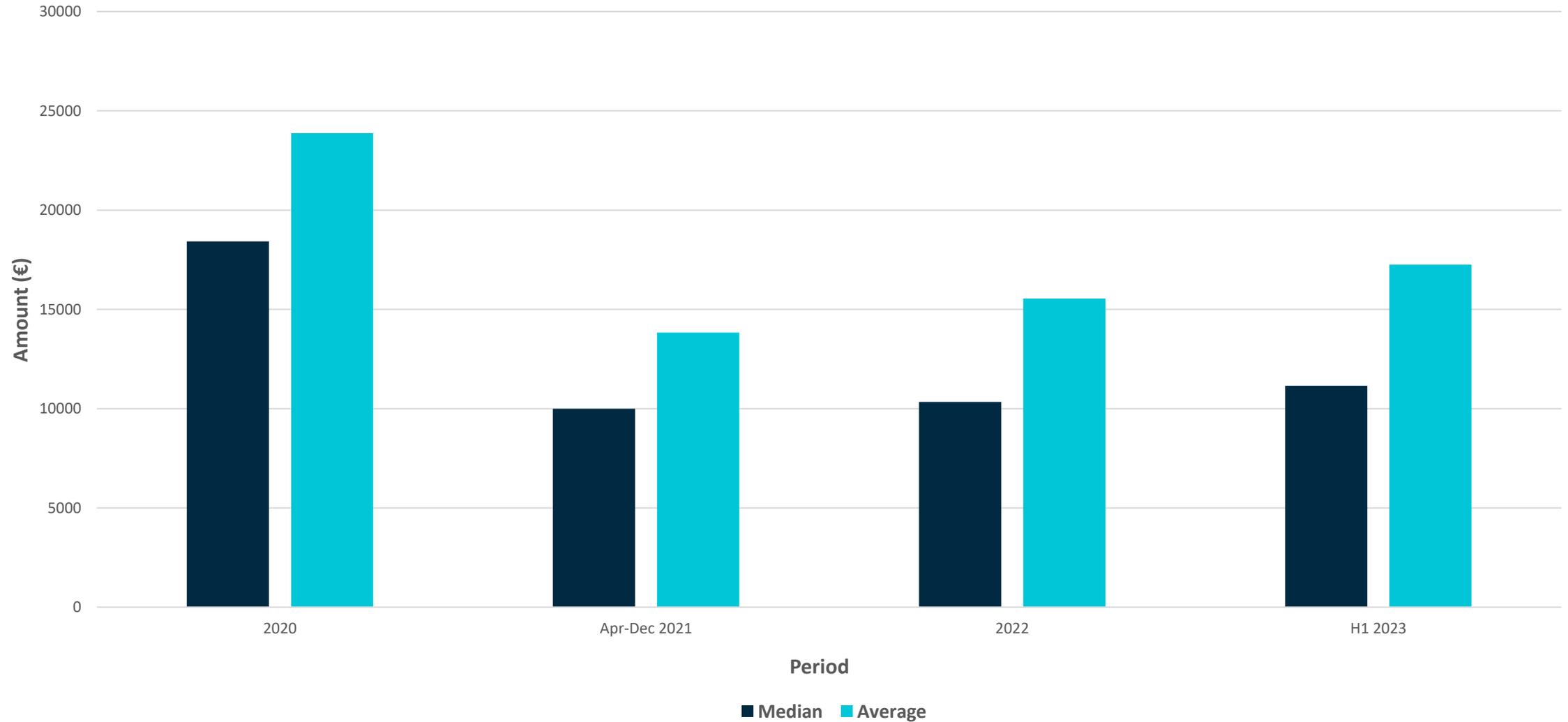
- 2023 H1 seen a 16% rise in claims submitted to the IRB compared to 2022 H1
- Increase in motor liability (+22%), public liability (+12%) and employers liability (+5%)
- Volume of claims submitted to IRB in 2023 35% lower than 2019





Injuries Resolution Board (IRB)

Median and Average Awards 2020 – June 2023

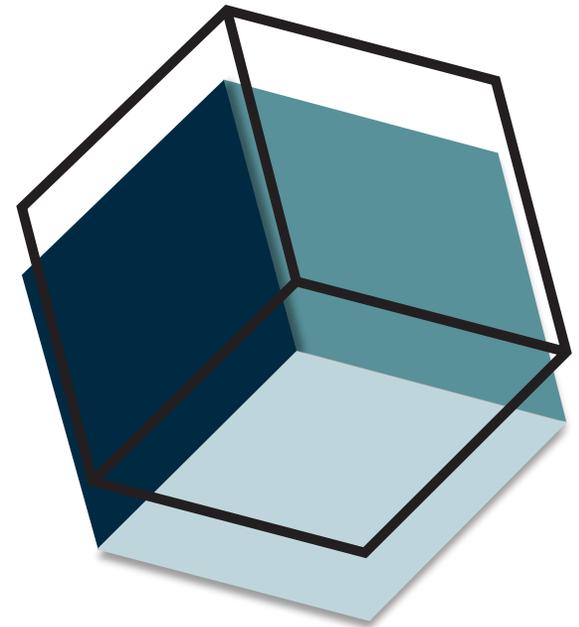




Legal Challenge for the PIGs

Delaney Case

- Ms Delaney suffered knee injuries and an ankle fracture in April 2019
- Book of Quantum would have provided an award of up to €34k
- IRB valued the general damages at €3k with reference to the PIGs
- High Court Ruled against Ms Delaney and she appealed to the Supreme Court
- Supreme Court ruling was made on 9th April 2024
- PIGs are here to stay





Catastrophic Injuries and Occupier's Liability Act

Periodic Payment Orders

- Alternative to lump sum
- IDWG: Provided short term and long term recommendations

Discount Rate for Catastrophic Injuries

- Currently 1.0% for future care costs and 1.5% for other economic or pecuniary losses
- No change to discount rates recommended but they should be kept under review
- Assume Plaintiff has risk averse investment profile

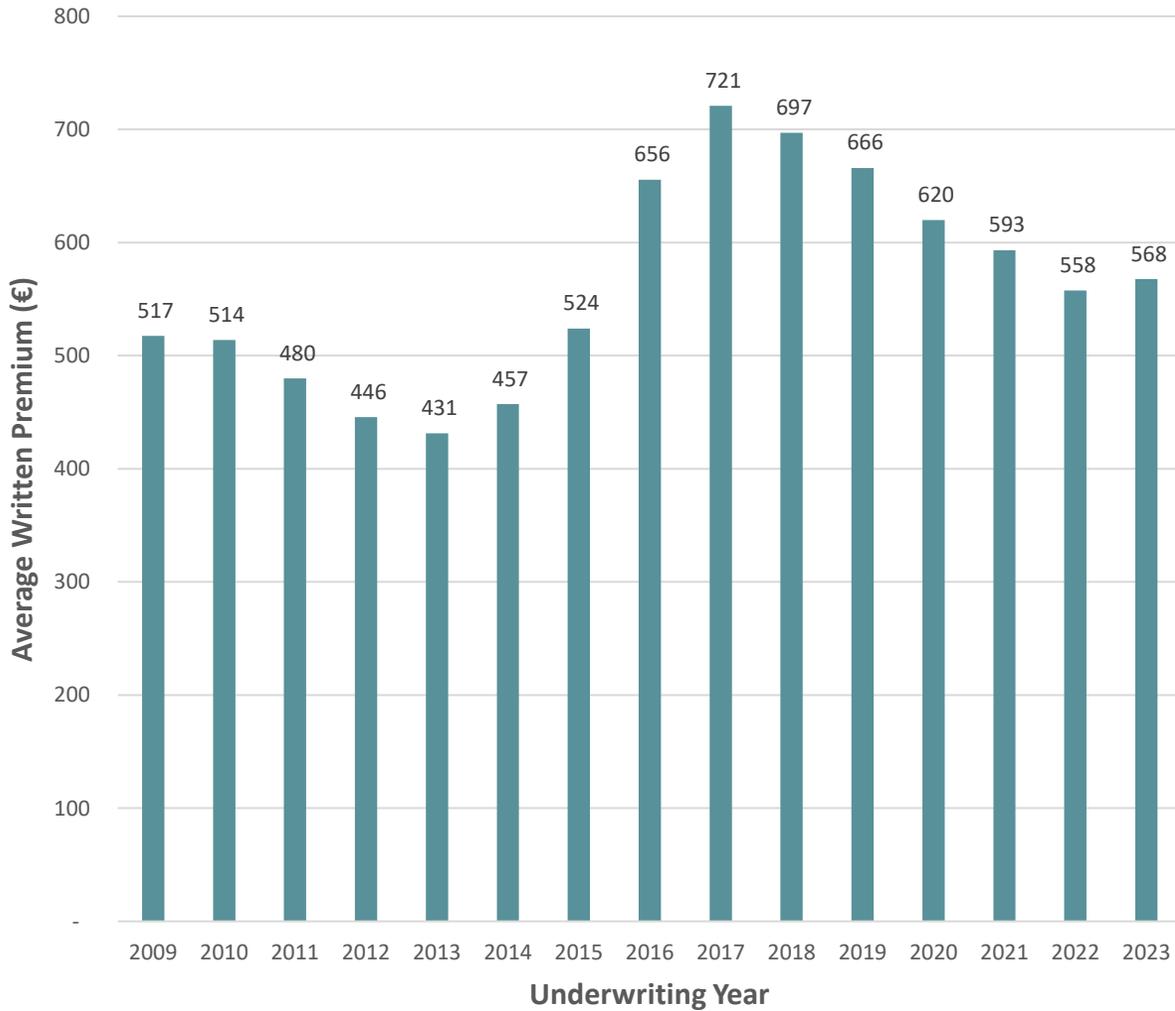
Occupiers Liability Act

- Courts and Civil Law Act 2023
- The duty of care on occupiers has been reduced
- The reforms also make it easier for occupiers to argue that individuals have voluntarily assumed certain risks, even without explicit agreements



Private Motor Insurance

Average Written Premium (€)



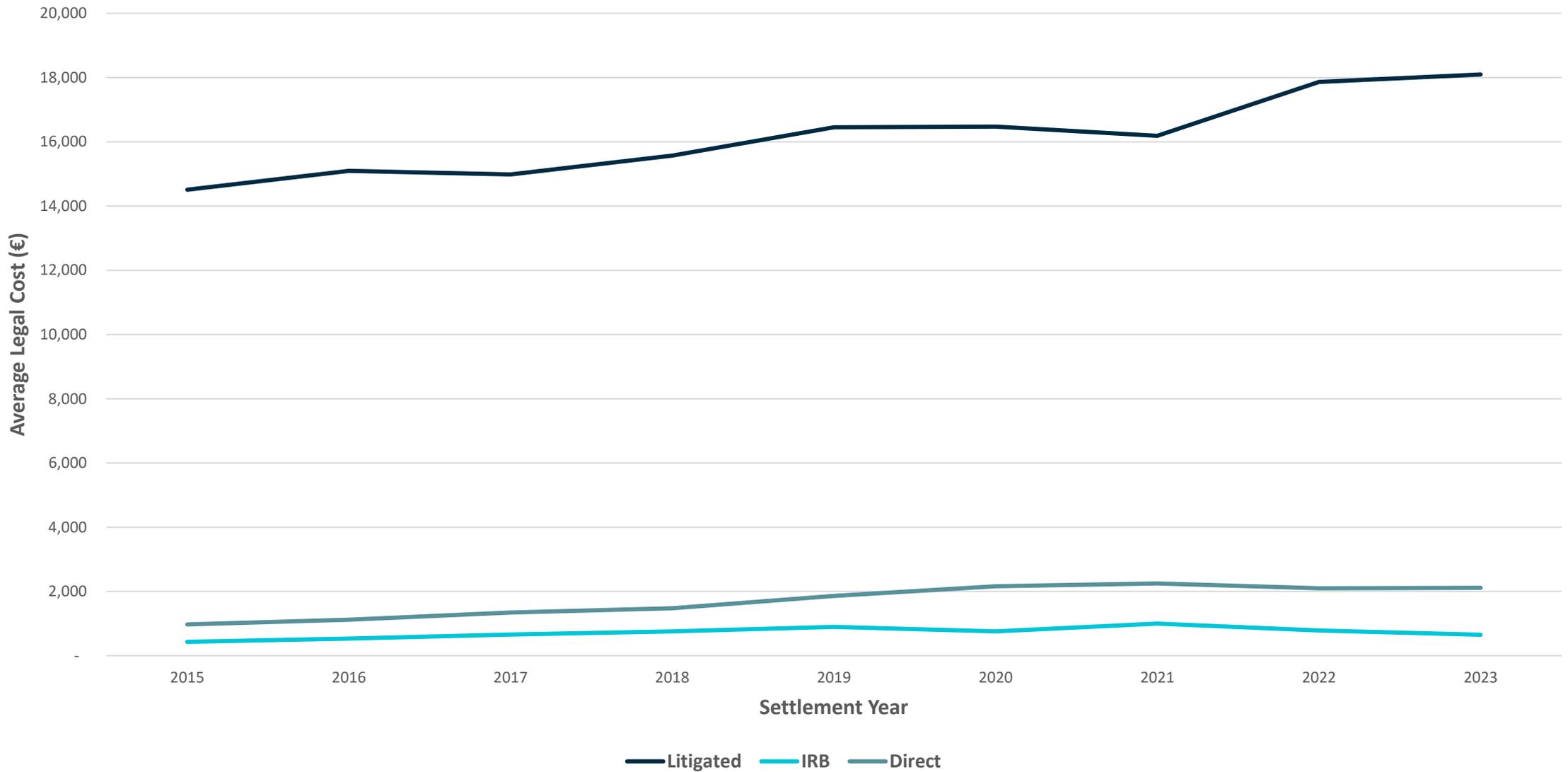
Annual Inflation for Spare Parts and Maintenance & Repair





Private Motor Insurance

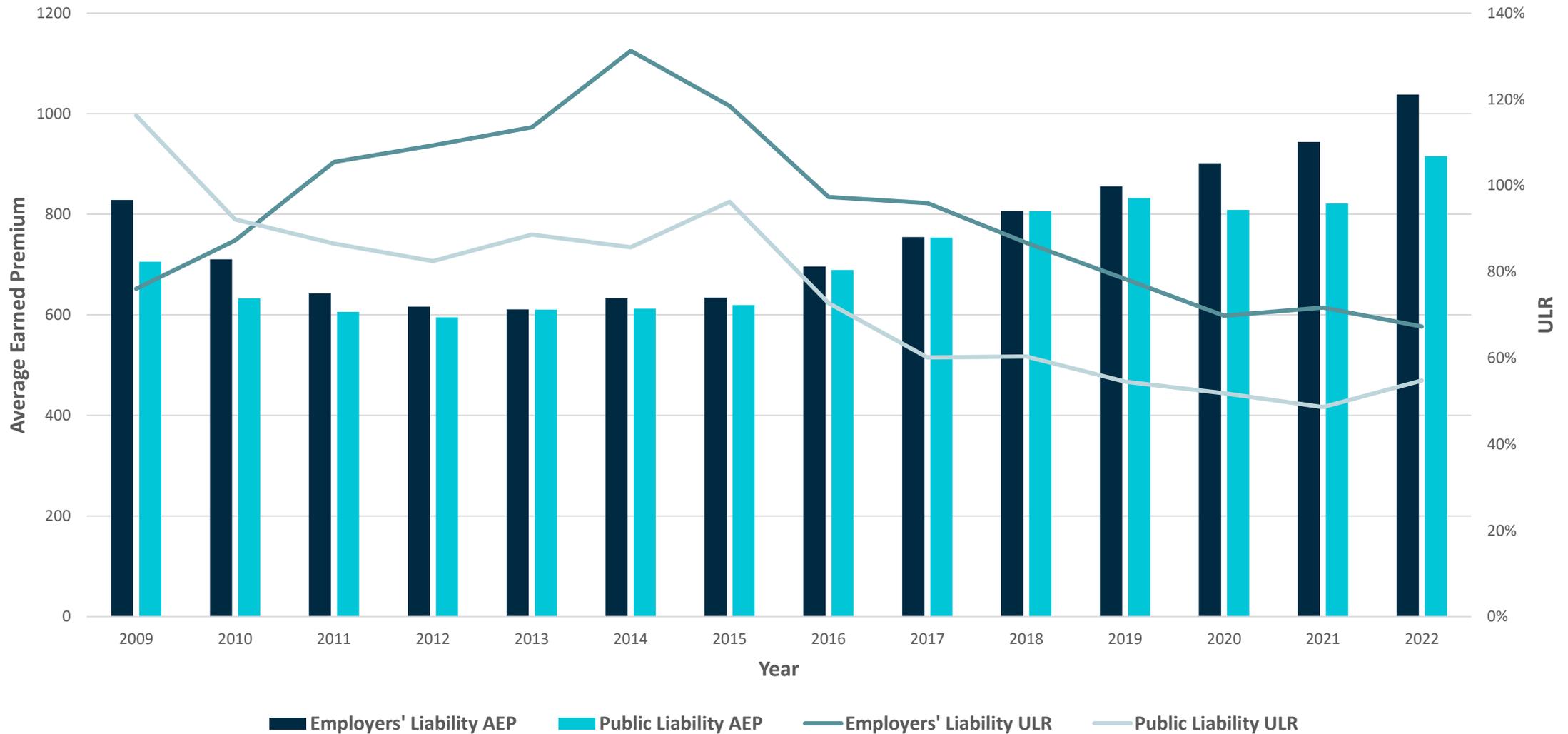
Average Legal Costs by Settlement Channel for Motor Claims (<€100k)





Employer's and Public Liability Insurance

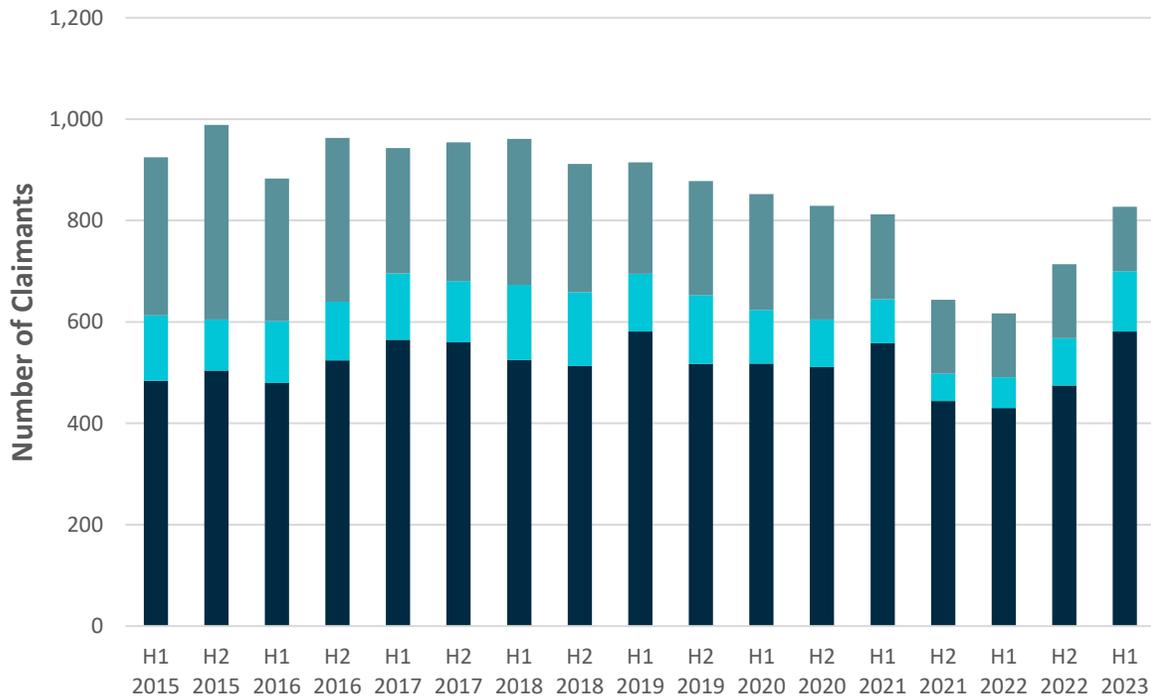
EL & PL Average Earned Premium and ULR





Employer's and Public Liability Insurance

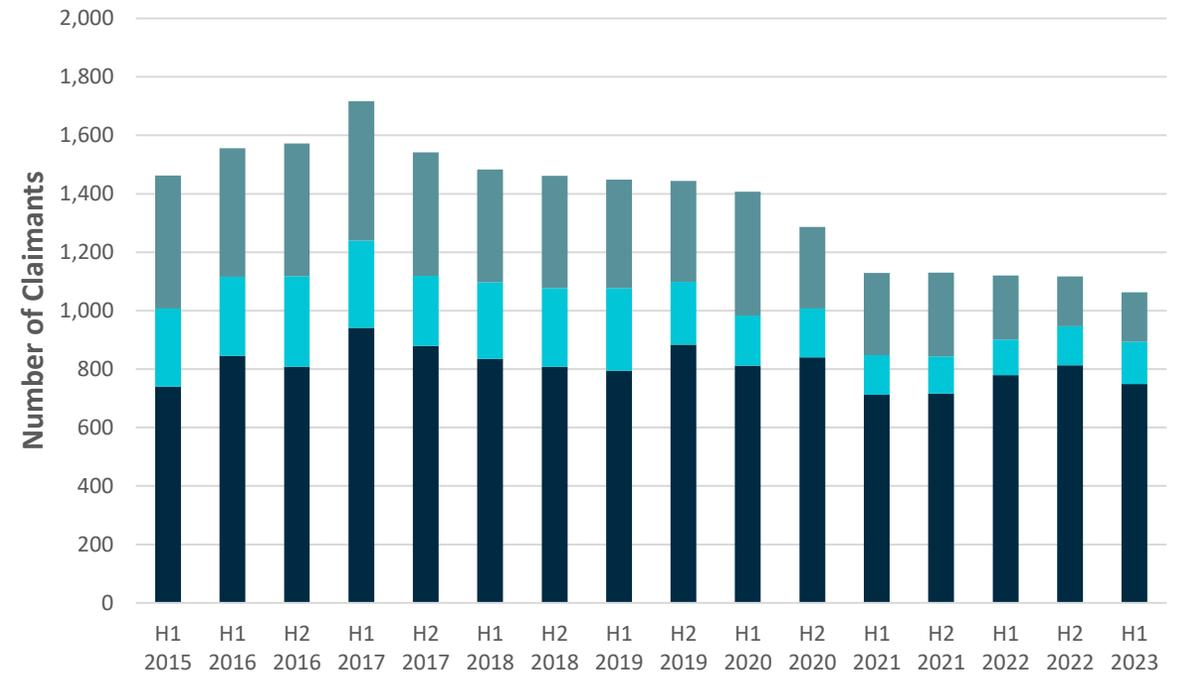
Number of Employers Liability Claims Settled via each Settlement Channel



Settlement Half Year

■ Litigated ■ IRB ■ Direct

Number of Public Liability Claims Settled via each Settlement Channel



Settlement Half Year

■ Litigated ■ IRB ■ Direct



Flood Risk

Storm Babet

- Occurred on 17th and 18th October 2023
- Fluvial flooding
- Midleton, Co. Cork
- 36 hours of rainfall
- Return period: 1/227 year event
- Estimated impact between €63m-€68m





Flood Risk – Irelands Approach

3 main principles

- Prevention
- Protection
- Preparedness

€1.3bn committed over the lifetime of the National Development Plan to 2030

OPW schemes protect against

- Fluvial flood: 1 in 100 year event
- Coastal flood: 1 in 200 year event

Storm Bert: Government providing support via Emergency Humanitarian Flooding Scheme for small businesses





Flood Risk - Other EU and Non-EU Countries Approach

UK

- Introduction of Flood Re in 2014 – lasts 25 years
- Scheme allows insurers to transfer highest flood risk elements at set premium
- Entirely funded by UK insurance industry
- Not compulsory to transfer risks to Flood Re

Netherlands

- Highly sensitive to flood risk
- Limburg Floods 2021 – Disaster Compensation Act
- Flood victims receive financial compensation
- Flood insurance is not compulsory

Germany

- Severe floods in Germany's Ahr Valley in July 2021
- Flood insurance is not compulsory

Spain

- Extraordinary Risk Insurance (ERI) offered by CCS – compulsory
- Aim – mitigate insurance protection gap
- CCS recently provided compensation for the Valencia floods in October 2024 - \$3.5bn damages





Electric vehicles

Environmental impact

- EVs emit around 60g of CO₂ per km travelled versus 130g of CO₂ for a petrol engine
- Zero tailpipe emissions

Safety Concerns

- General concern around fire risk
- Lower frequency but higher severity than ICE vehicles

Driving Behaviour

- University of Limerick Study – 3.2% increase in collisions when compared to traditional vehicles

Repair Costs

- Costs are reportedly higher than ICE vehicles
- Giga casting





E-Scooters

New Laws introduced in Ireland, May 20th 2024

An e-scooter user must:

- Be a minimum of 16 years old
- Obey a speed limit of 20km/h
- Have lights, a bell or other audible warning device, reflectors and brakes on their e-scooter
- Keep their e-scooter in a roadworthy condition at all times
- Abide by the same rules of the road as cyclists, including traffic lights and road signs

There is no requirement for any of insurance, tax or vehicle registration





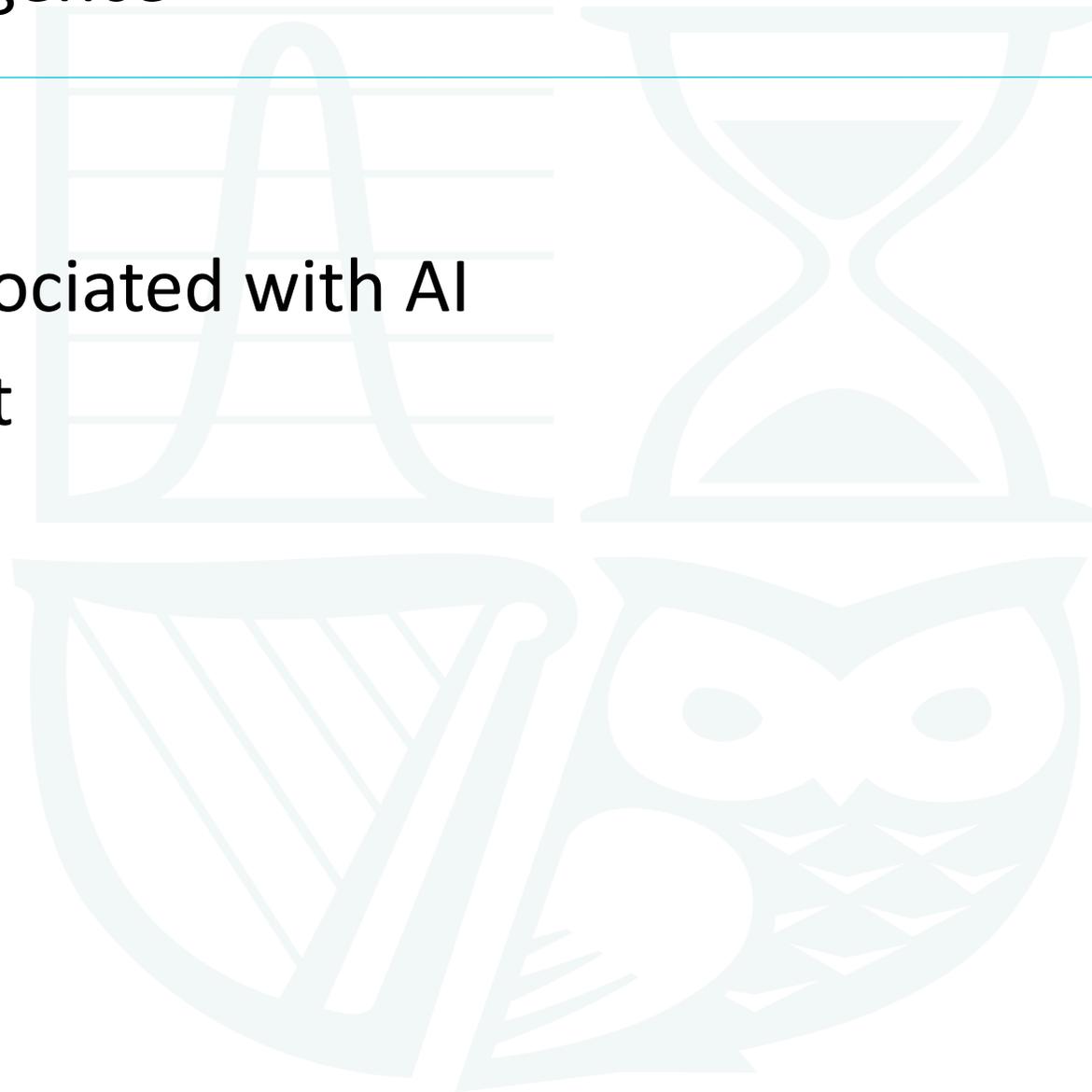
Society of Actuaries in Ireland

Artificial Intelligence

Nia Powers

Artificial Intelligence

- Uses of AI
- Key Risks associated with AI
- The EU AI Act



Use Cases of AI in Insurance

Pricing

Claims
Processing

Underwriting
& Risk
Assessments

Chatbots &
Virtual
Assistants

Key Risks

Model

Data

Data Privacy
and Cyber
Security

Ethical

Regulatory &
Compliance

Legal

Practical Examples of AI 'gone wrong'

Technology

Amazon scraps secret AI recruiting tool that showed bias against women

Experimental tool used AI to give job candidates scores ranging from one to five stars

Expand



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NBCBLK

Racial bias found in widely used health care algorithm

An estimated 200 million people are affected each year by similar tools that are used in hospital networks

f X e

Nov. 6, 2019, 7:38 PM GMT / Updated Nov. 7, 2019, 4:07 PM GMT

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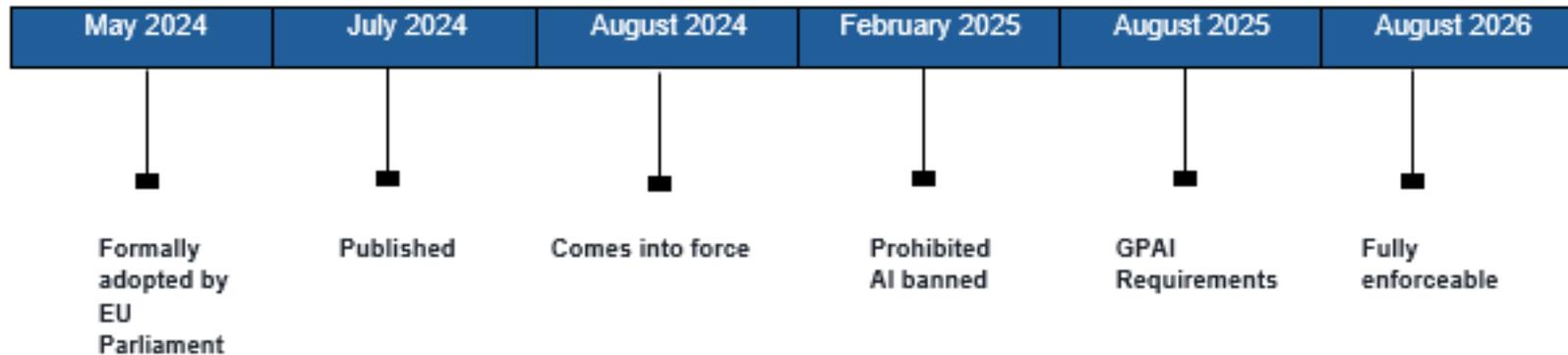


Apple Card Investigated After Gender Discrimination Complaints

A prominent software developer said on Twitter that the credit card was "sexist" against women applying for credit.

Overview of the AI Act

- The AI Act applies across all sectors of the economy, including insurance.
- Formally adopted by the European Parliament this year and was published in the EU Official Journal in July 2024.
- The new law comes into force on 1 August 2024 - most provisions will not take effect for a further two years after that date, giving insurers time to comply with the new regulations.



Insurance Applications – use cases

Unacceptable Risk

Social scoring for premium setting

Exploiting vulnerabilities for policy sales

Biometric data for risk assessment

High Risk

Risk assessment and pricing in health or life insurance

Credit scoring

Limited Risk

AI systems used for marketing automation

Customer ChatBots

Preparatory work for use cases meeting “high risk” AI systems

Policy renewal pattern analysis

Minimal Risk

Email spam filters

Basic data analytics for Marketing

Document processing and automation

Training and development

AI systems used for operational efficiency

Risk Mitigation Strategies



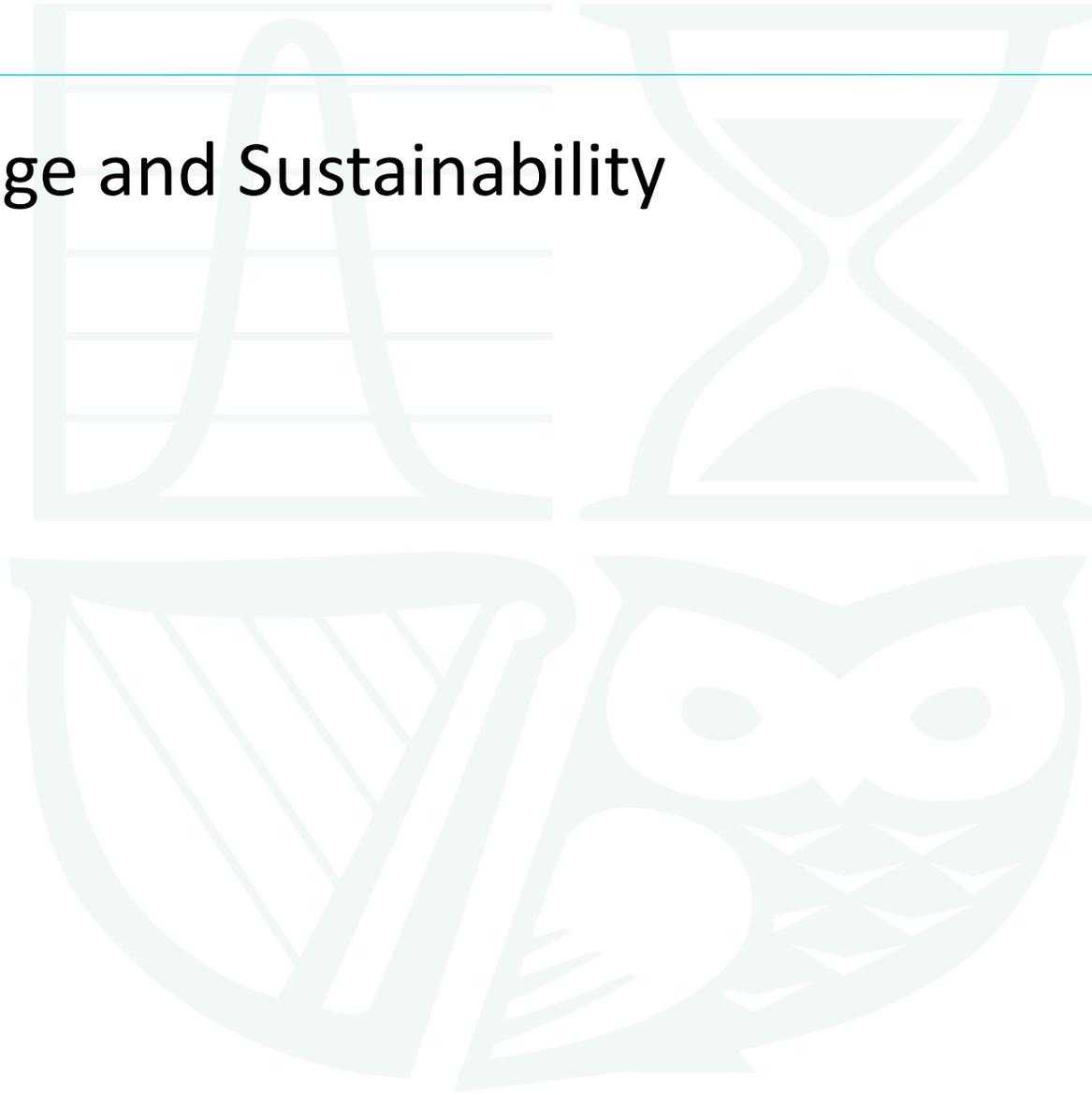


Society of Actuaries in Ireland

Regulatory Updates

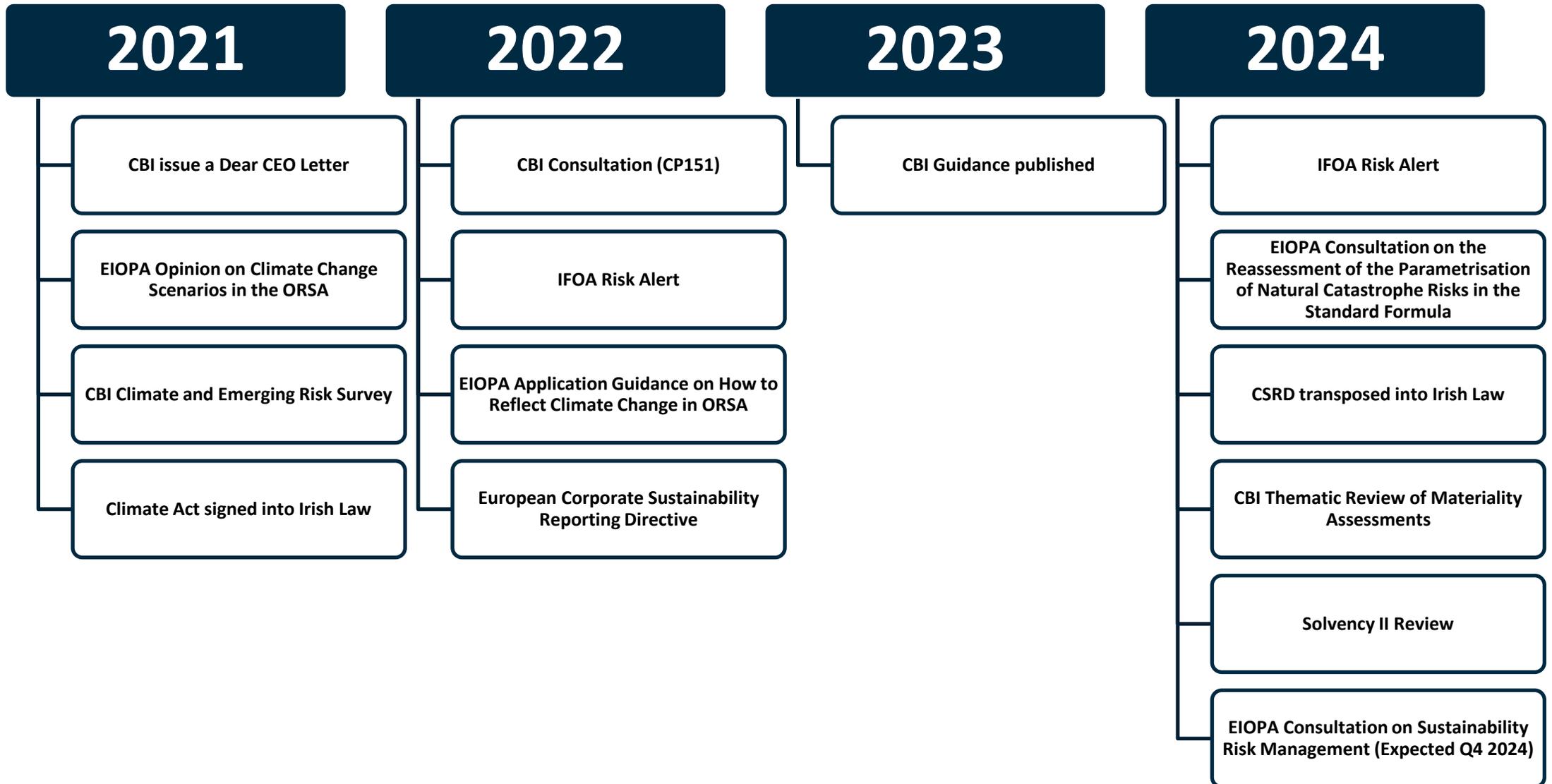
Regulatory Updates

- Climate Change and Sustainability
- CPC



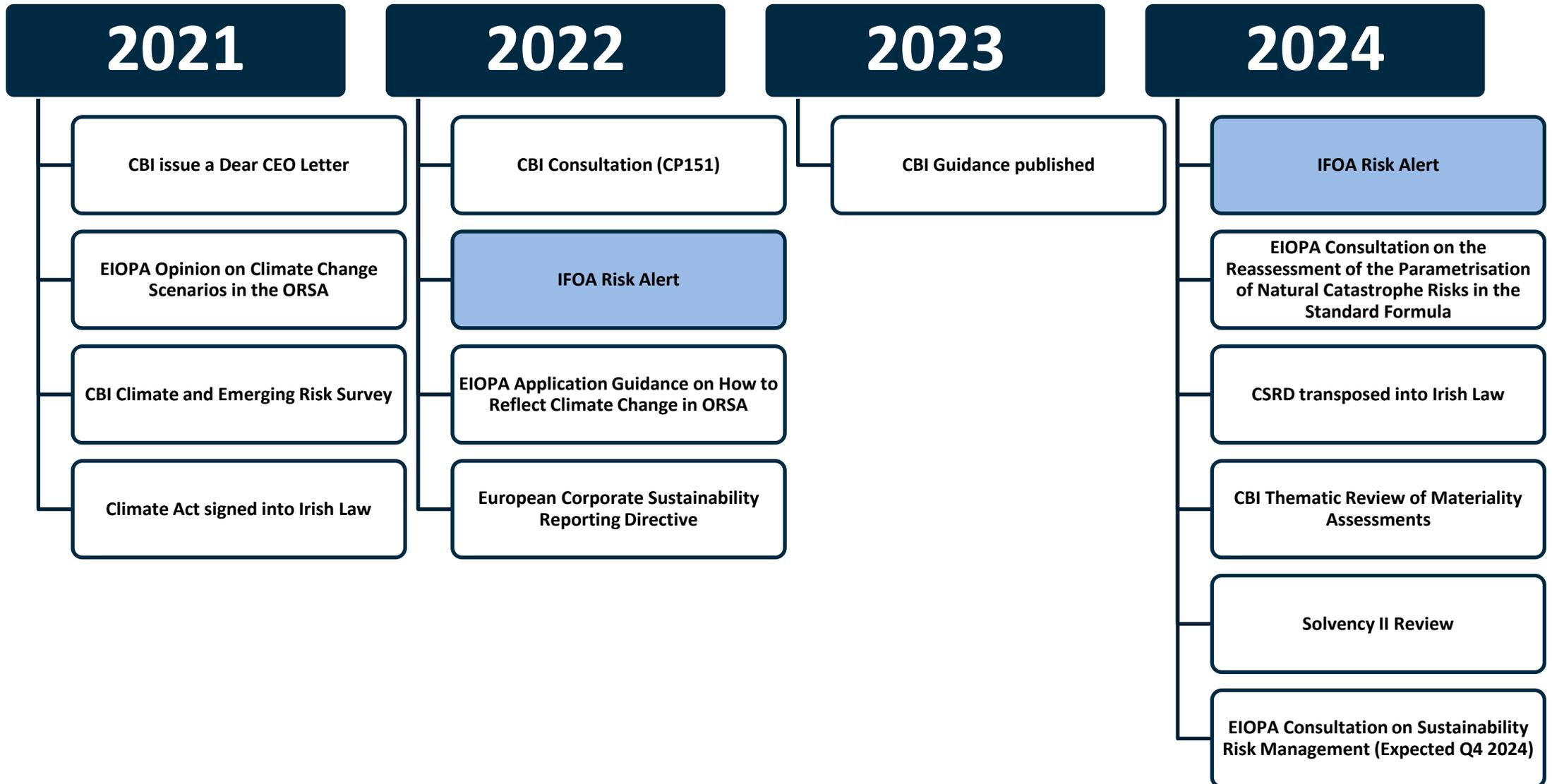


Climate Change and Sustainability Regulations



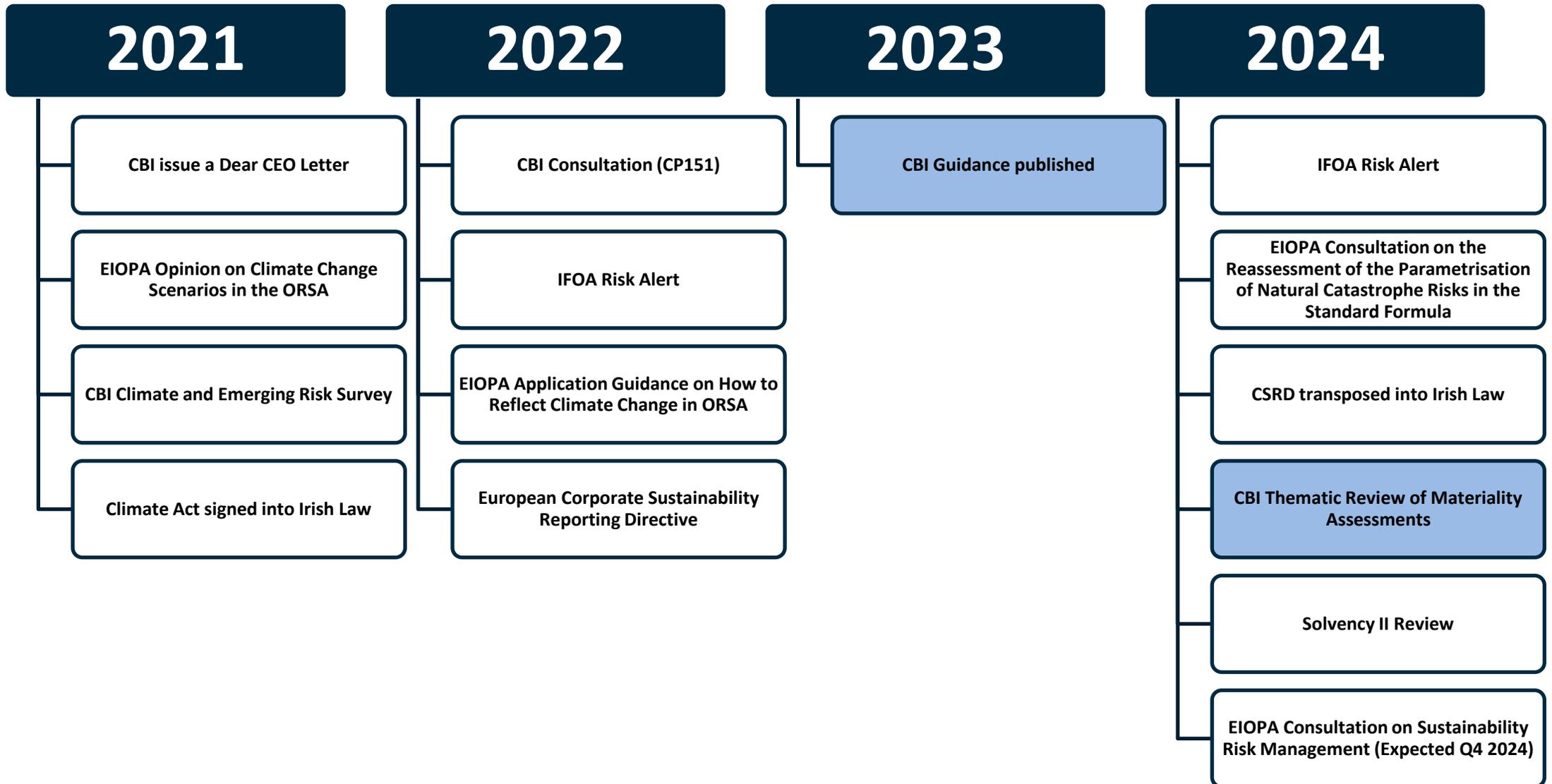


Climate Change and Sustainability Regulations



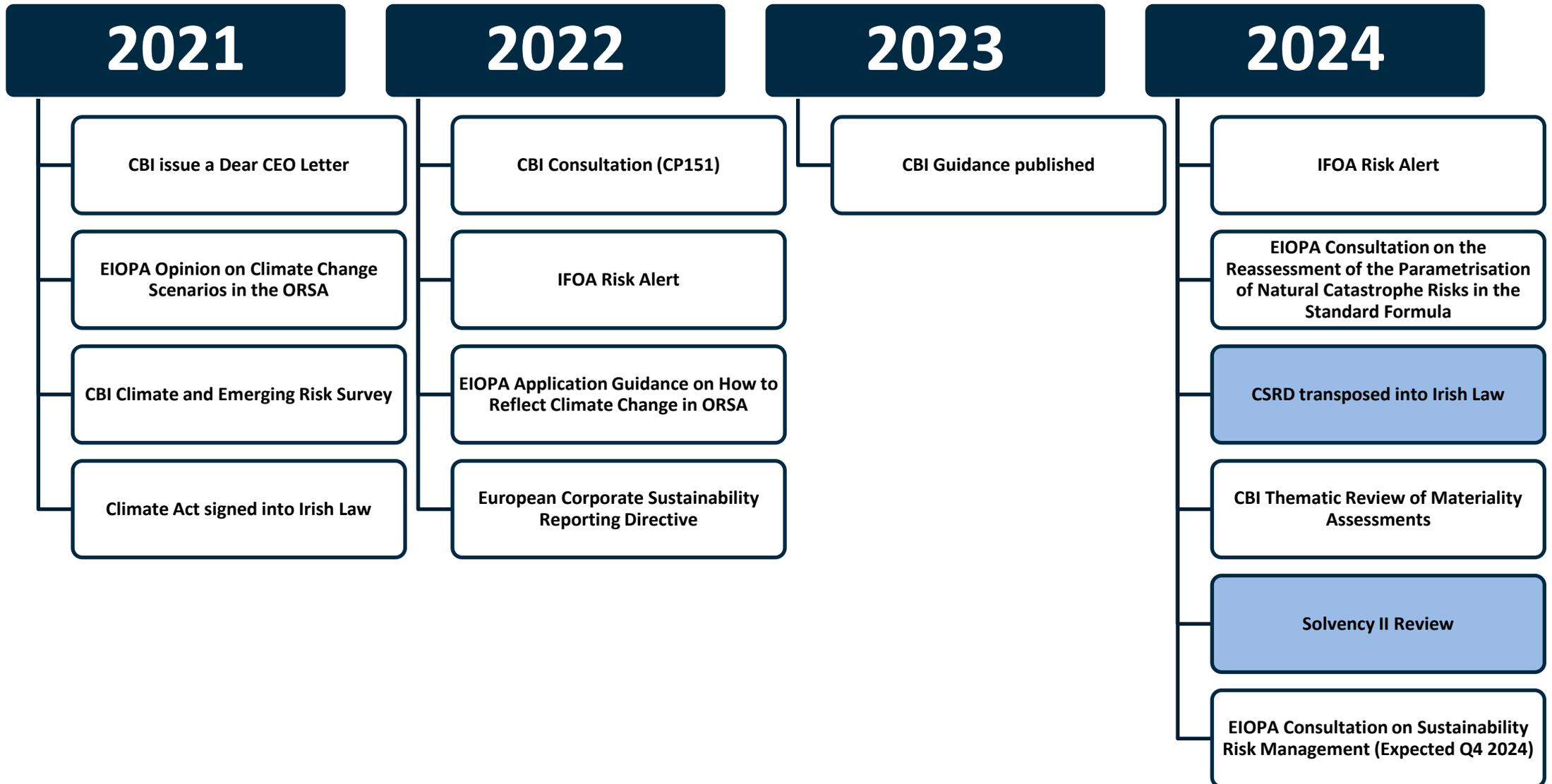


Climate Change and Sustainability Regulations





Climate Change and Sustainability Regulations





Society of Actuaries in Ireland

Regulatory Updates

Francisco Tulio

Regulatory Updates

- CPC





Review of the Consumer Protection Code

What happened and when?

Evolution of Consumer Protection Regulation in Ireland



The Consumer Protection Code "the Code" (CPC)

Consumer Protection Risk Assessment (CPRA)

The European Insurance and Occupational Pensions Authority (EIOPA)

Insurance Distribution Directive (IDD)



Review of the Consumer Protection Code

- CBI Proposals

Principal Policy Proposals	Securing Customers' Interests	How firms should meet their best interests obligation Prioritisation of consumer needs in firm decision-making.
	Digitalisation	Firms should deploy a customer focus in the design and implementation of digital services and delivery channels
	Informing Effectively	Firms' communications must effectively inform customers to make informed decisions to support their financial well-being
	Mortgage Credit and Switching	Firms must support customers to make informed decisions and facilitate mortgage switching
	Unregulated Activities	The provision of unregulated activities by regulated firms must not confuse customers on regulatory status and protections
	Frauds and Scams	Consumers need to be protected from evolving frauds and scams to underpin confidence in financial services
	Protecting Consumers in Vulnerable Circumstances	Firms should effectively support consumers in vulnerable circumstances
	Climate Risk	In supporting climate transition, firms needs to consider consumer sustainability preferences and avoid 'greenwashing'



Review of the Consumer Protection Code

- CBI Proposals (Continued)

Additional Policy Proposals	Automatic Renewal of Insurance Policies	Explicit consumer consent ("opt-in") required for certain policies like gadget, travel, dental, and pet insurance. No opt-in requirement for home, motor, and health insurance due to critical coverage risks.
	Insurance Switching	Introduction of pre-renewal notifications 40 days before renewal to encourage comparison shopping. Aims to give consumers more time to find better-suited or cost-effective insurance options
	Investments and Pensions	Consumers encouraged to regularly review the suitability of investment and pension products. Firms must inform customers about ongoing product suitability in annual statements. Firms not offering suitability assessments must clearly explain this to customers
	Handling of Errors and Complaints	Error and Complaint Management Firms required to establish systems for tracking and managing complaints. Regular analysis of complaints every six months to identify trends or systemic issues. Display of complaints procedures on digital platforms.
	Record Keeping by Firms	Record Retention Periods For consumers who do not become formal clients, record retention reduced to 12 months (from 6 years).



Review of the Consumer Protection Code

- Next Steps





Thank You!

